C L I F F O R D C H A N C E



US DISTRICT COURT SON

In re Terrorist Attacks of September 11, 2001, 03 MDL 1570 (GBD) (FM)

This document relates to:

Ashton, et al v. Al Qaeda Islamic, et al, 02-cv-6977

Burnett v. Arab Bank, PLC, 03-cv-9849

Federal Insurance Co. v. Al Qaida, 03-cv-6978

O'Neill v. Al Baraka Investment & Devel. Corp., 04-cv-01923

Continental Casualty Co. v. Al Qaeda, 04-cv-05970

Cantor Fitzgerald & Co. v. Akida Bank Private Limited, 04-cv-07065

Euro Brokers Inc. v. Al Baraka Investment & Devel. Corp., 04-cv-07279

APR 1 0.2013

Dear Judge Maas:

Pursuant to this Court's January 20, 2011 order regarding discovery motions and Federal Rule of Civil Procedure 37 the Moving Defendants' submit this Letter Motion To Compel Production of Documents Improperly Designated as Privileged in the above-captioned case (the "Litigation").

Plaintiffs in the Litigation submitted a privilege log ("Privilege Log") on February 1, 2013 that is materially deficient for two reasons. First, it appears that all of the documents on the log are plainly not privileged and, in addition, many should not have been part of this litigation. Second, the log itself is deficient in that is lacks adequate details about the documents—indeed, we cannot even assess to which defendant a document relates. Regrettably, Plaintiffs' have refused to engage with Moving Defendants on these issues. Thus, Moving Defendants respectfully request that the Court order Plaintiffs to produce each document on their log. In the alternative, the Court should order Plaintiffs to amend their log to comply with Local Rule 26.2 and this Court's order concerning privilege logs.

INTRODUCTION

Plaintiffs and Moving Defendants conducted extensive negotiations regarding the content of the privilege logs. Throughout these negotiations, Plaintiffs pushed for the exchange of detailed privileged logs. Plaintiffs explained that such logs were necessary to ensure that the logs would contain enough information to "distill which privilege claims will be disputed, help the parties engage in meaningful meet and confers to distill what issues need to be brought to the

The Privilege Log relates to requests for production submitted by Defendants Al Haramain Islamic Foundation, Inc. (USA), Dubai Islamic Bank, International Islamic Relief Organization, Muslim World League, Sana-Bell, Inc., Sanabel Al Kheer, World Assembly of Muslim Youth / World Assembly of Muslim Youth International, Wael Jelaidan, and Perouz Sedaghaty.

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courts [sic] attention, and help the court [sic] to work through the disputes that are brought to the Court for resolution." See PEC Letter to Judge Maas dated October 19, 2012, attached hereto as Ex. 1. On November 19, 2012, the Court ordered the parties to include the following information in their privilege logs: the type of document; the general subject matter of the document; the date of the document; the authors of the document, the addressees of the document and any other recipients, and, where not apparent, the relationship of the authors, addressees, and recipients to one another; and if the document is an electronic document, its file size. See Ex. 2.

On February 1, 2013, the parties exchanged their privilege logs. Plaintiffs' Privilege Log (attached as Ex. 3) suffers from two key defects. First, Plaintiffs' Privilege Log includes two general categories of documents that, on their face, are not privileged: (i) documents associated with Plaintiffs' FOIA requests to various government agencies and the agencies' responses; and (ii) documents that were produced in the case captioned Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG) (VVP) (E.D.N.Y.). Second, the Privilege Log is not sufficiently detailed because it did not (i) delineate which purportedly privileged document pertained to which Moving Defendant's document requests, nor (ii) contain other information necessary to determine the subject matter of the listed documents.

On February 12, 2013, Moving Defendants sent Plaintiffs a letter detailing these deficiencies and asking Plaintiffs to produce the non-privileged documents and, to the extent Plaintiffs continued to claim privilege for any remaining documents, to amend their log to describe more clearly the claimed privilege. Plaintiffs have neither responded to this letter nor produced the documents. As set forth more fully below, Plaintiffs' failure to produce non-privileged documents and to amend their log violate the Federal Rules and this Court's orders. Therefore, the Court should order Plaintiffs to produce each document on their log and further, to amend their Privilege Log to comply with Local Rule 26.2 and this Court's previous orders.

ARGUMENT

I. Improperly Withheld Documents.

A. FOIA Requests and Responses.

Eight hundred fifty entries in Plaintiffs' Privilege Log consist almost entirely of correspondence relating to FOIA requests Plaintiffs served on various agencies of the U.S. government (ranging from the Bureau of Engraving and Printing to the Jimmy Carter Presidential Library), with a small number of other items relating to similar correspondence with international judicial tribunals (collectively, "FOIA Documents"). The FOIA Documents fall generally into three categories: (i) correspondence from Plaintiffs' counsel to government officials; (ii) correspondence from government officials to Plaintiffs' counsel; and (iii) attachments to government responses that are apparently government documents produced in response to FOIA requests. The Privilege Log erroneously asserts a blanket "Attorney Work Product" protection as to each of these entries. None of these three categories are privileged.

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First, with regard to correspondence from Plaintiffs' counsel to government officials, "it is well settled that the 'voluntary disclosure of confidential material to a third party waives any applicable attorney-client privilege." Crawford v. Franklin Credit Mgmt. Corp., 261 F.R.D. 34, 43 (S.D.N.Y. 2009) (Maas, M.J.) (quoting Schanfield v. Sojitz Corp. of Am., No. 07-9716, 2009 WL 577659, at *3 (S.D.N.Y. Mar. 6, 2009)). In the Second Circuit and elsewhere, voluntary disclosure of information to the government waives the privilege, including the work-product doctrine. See, e.g., In re Initial Public Offering Sec. Litig., 249 F.R.D. 457, 466-67 (S.D.N.Y. 2008); Bank of Am., N.A. v. Terra Nova Ins. Co., 212 F.R.D. 166, 170-71 (S.D.N.Y. 2002). Plaintiffs voluntarily disclosed to the recipient agencies information in these FOIA requests. Such information is no more work product than any document request served under Federal Rule of Civil Procedure 34 or any subpoena served under Federal of Civil Procedure Rule 45. Because FOIA requests are functionally analogous to requests like Rule 45 third-party subpoenas—which are not work product protected—Plaintiffs cannot shield their discovery of governmental records through the guise of a FOIA request.

Second, correspondence prepared by government officials is not attorney work product. The government officials responsible for preparing these responses are in no way involved in the MDL-1570 litigation and did not prepare the responses or attachments in anticipation of litigation. Indeed, this correspondence was prepared by third parties—not agents of Plaintiffs.

Third, underlying primary-source documents attached to the government's responses to Plaintiffs' FOIA requests are not work product. Accordingly, they do not pose any conceivable privilege concerns.

In fact, "[i]t is generally accepted that a response to a request under the FOIA is a public disclosure." U.S. ex rel. Grynberg v. Praxair, Inc., 389 F.3d 1038, 1050-1051 (10th Cir. 2004); see also United States ex rel. Schumer v. Hughes Aircraft Co., 63 F.3d 1512, 1519-20 (9th Cir. 1995), vacated on other grounds, 520 U.S. 939 (1997); United States ex rel. Reagan v. East Texas Medical Ctr. Reg'l Healthcare Sys., 274 F.Supp.2d 824, 845 n. 15 (S.D. Tex. 2003) (and cases cited therein). Such information can be obtained by any other person through making its own FOIA request. "When a document must be disclosed under FOIA, it must be disclosed to the general public and the identity of the requester is irrelevant to whether disclosure is required." Stonehill v. IRS, 558 F.3d 534, 538-39 (D.C. Cir. 2009).

Plaintiffs should have produced the FOIA requests and responses in discovery months ago, and no basis exists for including these documents on the Privilege Log. Moving Defendants seek an order compelling Plaintiffs to produce these responsive documents to defense counsel.

B. The Arab Bank Confidential Documents.

Plaintiffs appear to have used confidential documents in violation of court orders in another litigation and now attempt to use the Privilege Log unfairly to shield those documents from production. Plaintiffs have withheld documents pursuant to approximately 167 privilege log entries, noting the documents are subject to a "Protective Order dated August 1, 2005, in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases" pending in the U.S. District Court for the Eastern District of New York. However, the protective order in

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that case specifically provided that documents produced and marked as confidential in that litigation can only be used in the consolidated *Arab Bank* litigation, and in any cases consolidated by that court:

3. <u>Use of Confidential Information</u>: Confidential Information and Highly Confidential Information shall not be used by any person, other than the Designating Party, for any purpose other than prosecuting, defending or settling Linde, et al. v. Arab Bank, PLC, Case No. CV-04-2799; Litle, et al. v. Arab Bank, PLC, Case No. CV-04-5449; Almog, et al. v. Arab Bank, PLC, Case No. CV-05-365; and Afriat-Kurtzer, et al. v. Arab Bank, PLC, Case No. CV-05-388. Any additional cases that are designated by order of the Court for cooperative or consolidated discovery with the foregoing cases shall by order therein be made subject to this Order and the parties thereto may use Confidential Information or Highly Confidential Information for no purpose other than prosecuting, defending or settling such cases. In no event shall Confidential Information or Highly Confidential Information be used for any business, competitive, personal, private, public, or other purposes, except as required by law.

Protective Order, ¶ 3, Linde v. Arab Bank, No. 04-2799 (E.D.N.Y. Aug. 1, 2005) (emphasis added) (attached as Ex. 4).

Counsel for the plaintiffs in these cases (*Almog* and *Afriat-Kurtzer*) also represent the *Burnett* and *Euro Brokers* plaintiffs in the MDL-1570 litigation, and are among the signatories to the *Arab Bank* Protective Order. It is not clear which of Plaintiffs' counsel in these cases have seen the *Arab Bank* documents listed on the Privilege Log or how the documents are responsive to requests for production in the instant Litigation. Plaintiffs have not obtained an order designating MDL-1570 for "cooperative or consolidated discovery" with the *Arab Bank* litigation. Thus, the *Arab Bank* discovery documents cannot be used by counsel in the MDL-1570 case for any purpose.

Plaintiffs' entry of documents subject to the *Arab Bank* Protective Order in the Privilege Log, however, suggests that the MDL-1570 plaintiffs and their counsel have been improperly using *Arab Bank* confidential documents in this Litigation, in direct contravention of the *Arab Bank* Protective Order. *See In re Zyprexa Injunction*, 474 F. Supp. 2d 385, 426-30 (E.D.N.Y. 2007), *aff'd sub nom. Eli Lilly & Co v. Gottstein*, 617 F.3d 186 (2d Cir. 2010) (sanctioning attorneys for improperly disclosing confidential discovery documents beyond the cases covered by the protective order); *see also Hunt v. Enzo Biochem, Inc.*, No. 06-170, 2012 WL 5199247, at *6-7 (S.D.N.Y. Oct. 22, 2012) (sanctions for improperly disclosing confidential documents).

Having assessed confidential documents from the *Arab Bank* litigation for responsiveness and relevance to this litigation, the MDL-1570 Plaintiffs cannot now hide behind the *Arab Bank* Protective Order to prevent their disclosure to Moving Defendants. Plaintiffs should have sought permission to disclose these documents during the discovery period, but failed to do so. Moving Defendants seek an order compelling Plaintiffs to immediately seek such permission and turn over these responsive documents to defense counsel.

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II. Lack of Sufficient Detail.

Even if the documents underlying Plaintiffs' Privilege Log were potentially subject to privilege protection, Plaintiffs' Privilege Log does not satisfy the express requirements of SDNY Local Rule 26.2 or the Court's November 19, 2012 Order Governing Identification of Privileged Documents ("Order"). Both Local Rule 26.2 and the Order require that Plaintiffs' Privilege Log identify the following information:

- (i) the type of document;
- (ii) the general subject matter of the document;
- (iii) the date of the document;
- (iv) the authors of the document, the addressees of the document and any other recipients, and, where not apparent, the relationship of the authors, addressees, and recipients to one another; and
- (v) if the document is an electronic document, its file size.

A. Subject Matter of Allegedly Privileged Documents.

Plaintiffs failed to provide the general subject matter of any purportedly privileged FOIA request, i.e., the categories of information—including the names of any individuals and entities—sought by each FOIA request. Indeed, Plaintiffs failed even to provide a heading for the subject matter of any document. Rather, the Privilege Log contains merely a "Title Ref./Description." The title of a document alone does not afforded the opposing party any way to assess the propriety of the assertion of privilege. See Klig v. Deloitte LLP, C.A. No. 4993-VCL, 2010 WL 3489735, at *5-6 (Del. Ch. Sept. 7, 2010) (finding a waiver of privilege because a party's log contained only boilerplate information about the logged documents). In addition, Plaintiffs have failed to list separately on their Privilege Log any of the documents produced by governmental agencies in response to FOIA requests. Instead, Plaintiffs merely show these documents as a "Yes" in an attachments field, without providing any details about those attachments.

Plaintiffs' log entries for the *Arab Bank* documents are also deficient. For example, Plaintiffs have failed to identify a single author or recipient for any of the *Arab Bank* documents listed on their log.

B. Defendants are Unable to Challenge Individual Log Entries.

Additionally, Plaintiffs failed to identify to which requests these allegedly privileged documents are responsive, or even to which defendant the "privileged" documents pertain. By omitting this information and by providing vague details about each document, Plaintiffs made it impossible for a defendant to assess whether an entry is responsive to the request of that defendant. Thus, a defendant needs to challenge the all of the documents on the Privilege Log because it cannot determine what entries may be relevant to that defendant.

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CONCLUSION

For the foregoing reasons, the Moving Defendants respectfully request the Court to order Plaintiffs to produce all of the documents on Plaintiffs' Privilege Log, or in the alternative, to amend the Privilege Log to comply with S.D.N.Y. Local Rule 26.2 and the Court's November 19, 2012 Order, including an adequate description of each document and a delineation as to which defendant each entry pertains.

Respectfully submitted,

Steven T. Cottreau

cc: MDL 1570 Plaintiffs' Executive Committees

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Alan Kabat, Bernabei & Wachtel, PLLC

EXHIBIT 1

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA FACSIMILE

October 19, 2012

The Honorable Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 740
New York, NY 10007

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

On behalf of the Plaintiffs' Executive Committees, we write in response to the letter sent to Your Honor earlier today from Clifford Chance on behalf of the defendants about the parties' ongoing discussions concerning a framework for exchanging privilege logs in the above-referenced litigation. As the PECs expressed in their portion of the agenda letter sent to Your Honor yesterday, we believe that the log issue remains the subject of ongoing meet and confer discussions and would have preferred to finalize those discussions before raising this issue for the Court's consideration. The defendants insistence to shortcut that obligation by failing to engage in discussions until the last minute, then seeking to cram down their version of a proposed order at the 11-hour is frustrating, to say the least. The fact that the parties conferring remained incomplete is evidenced by the fact that, among the defendants' last communications to plaintiffs is a communication advising that, because defendants had not had time to circulate our proposal to other defendants for comment or consensus, they would wait to address the proposal at the hearing on Monday.

However, inasmuch as defendants have raised the issue for the Court's attention, plaintiffs are providing Your Honor with the (1) the language plaintiffs propose for the Stipulation Order (Attachment A), (2) a version of the proposed stipulation order that indicates in margin comments where the plaintiffs' version differs with the defendants' proposal (Attachment

The Honorable Frank Maas, U.S.M.J. October 19, 2012 Page 2

B), (3) the plaintiffs' correspondence with defendants explaining the plaintiffs' rationale for the plaintiffs' proposal (Attachments C and D).

Plaintiffs note the following differences, as indicated in the margins of Attachment B.

1. The Date Privilege Attaches to Defendants' Communications with Their Counsel Should Mirror the Date the Duty to Preserve Begins. [See Proposed Stipulation 1.(i) and Comment A1.]

The first dispute concerns when privilege attaches to a defendant's communications with that defendant's counsel. Defendants contend that privilege attaches to their communication on after September 10, 2001, based on the theory that even before a complaint was filed and served they may have communicated with counsel in anticipation of litigation. Plaintiffs have countered that that view is not consonant with at least some defendants' view that their obligation to preserve documents did not begin on September 11, 2001. Accordingly, plaintiffs have recommended that the provision proposed for paragraph 1.(i) should create consistency between a defendant's position on privilege and its position on the date a duty to preserve evidence attached. For example, if a defendant argues that its duty to preserve evidence attaches later, then the privilege should not attach until that time either. Plaintiffs have proposed the following language:

"Any defendant asserting that its duty to preserve evidence did not attach until after September 11, 2001, shall identify in its privilege log any communications with counsel for which it is claiming privilege between September 10, 2001 and the date on which the defendant claims that its duty to preserve evidence attached."

2. The Extent to Which Defendants' Counsels' Communications Are Excluded Form a Privilege Log Should Be Determined Based on the Authorizations the Defendants Accepted in CMO # 5. [See Proposed Stipulation 1.(iii) and Comment A2.]

The second dispute concerns whether communication among defense counsel is entitled to be broadly recognized as privileged and omitted from the privilege logs. Despite repeated requests, defendants have offered little explanation as to why communications among defendants' counsel should be privileged. And contrary to defendants' letter to the Court, plaintiffs have explained the reason for the distinct difference between plaintiffs' counsels' communication and theirs.

Since the outset of this litigation, defendants have emphasized the varying interests of each of the defendants and used those varying interests as a premise to resist the organizational structure and authority of the Defendants' Executive Committee ("DEC"). Only after plaintiffs complained about the inability to coordinate even minor procedural matters with the defendants, the defendants crafted their own Case Management Order ("CMO") that specifically and strictly

The Honorable Frank Maas, U.S.M.J. October 19, 2012 Page 3

limited the authority of the DEC to four items specifically set out in the CMO. The order, crafted by the defendants, provides for the following strictly limited authority for the DEC:

- a. To confer and agree with the Plaintiffs' Executive Committees on scheduling matters relating to court hearings, depositions, and deadlines affecting Defendants generally, and on proposed agenda items for court hearings;
- b. To coordinate communications with counsel for any Plaintiff seeking the consent of Defendants generally to a nondispositive motion;
- c. To coordinate the examination of witnesses by defense counsel at a deposition or hearing; and
- d. To coordinate communications with Plaintiffs' Executive Committees and with the Court concerning any requested changes in this Case Management and Pretrial Scheduling Order.

CMO #5, Docket Entry # 1547 (filed December 9, 2005). In fact, the order even states that aside from these four areas of authority, the DEC "shall have ... no other authority."

These limited responsibilities stand in stark contrast with the broad obligations and authority the Court imposed on the PECs in CMO #3, Docket Entry # 248 (filed June 16, 2004). In CMO # 3, the Court authorized the PECs to fulfill its responsibilities by conducting a wide range of tasks, concluding with the authority to "otherwise coordinate the work of plaintiffs' counsel and perform such other functions as necessary and appropriate to complete pretrial proceedings in [03 MDL 1570] as may be authorized by the Court."

Although defense counsel have expressed division among themselves and resisted the same type of coordination to which the plaintiffs' counsel have agreed, plaintiffs have expressed willingness to compromise to exclude from the log those communications among defendants' counsel which are within the authorizations described in CMO # 5, paragraph 1.(a) to 1.(d).

To the extent that defendants insist that a broader recognition of a privilege is warranted, plaintiffs request that the Court direct them to make an application to the Court and allow the issue to be fully brief.

3. The Framework for the Proposed Privilege Log Should be Informed By the Facciola-Redgrave Framework Recommended By Judge Maas During the April 12, 2011 Conference. [See Proposed Stipulation 3.(i), 5, 6 and Comments A3-A6 and A8-A11, and Transcript of April 12, 2011 Conference, at 61.]

Although plaintiffs do not dispute that the items referenced in Local Rule 26.2 should be included on the proposed privilege logs, plaintiffs have recommended incorporation of proposals included in the article by Judge Facciola concerning privilege logs, which the court recommended to the parties during the April 12, 2011 conference in this matter. See John M. Facciola and Jonathan M. Redgrave, Asserting and Challenging Privilege Claims in Modern Litigation: The Facciola-Redgrave Framework, Federal Courts L. Rev. Vol. 4, Issue 1, at 48-49 (hereinafter "Facciola"). While the plaintiffs appreciate the defendants focus on simplifying the

The Honorable Frank Maas, U.S.M.J. October 19, 2012 Page 4

process of creating the logs, inclusion of the several additional items of information suggested in the Facciola article will also help to distill which privilege claims will be disputed, help the parties engage in meaningful meet and confers to distill what issues need to be brought to the courts attention, and help the court to work through the disputes that are brought to the Court for resolution.

4. Dates Provided in Privilege Logs Should Include Western (i.e., Gregorian) dates. [See Proposed Stipulation 5 (vi) and Comment A7.]

Many documents in this litigation present with dates that are not in Western format. Plaintiffs merely propose, and the defendants oppose, that to the extent that the date on the document is depicted in non-Western format (e.g., a Hijra date), in addition to providing the date depicted in the document, a Western date (i.e., Gregorian date) should be provided in the log where it is possible to discern that date.

Respectfully submitted,

/s/ Robert T. Haefele

ROBERT T. HAEFELE FOR THE MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

cc: Hon. George B. Daniels (By Federal Express) MDL-1570 counsel (By electronic mail)

Exhibit A

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
In re Terrorist Attacks on September 11, 2001))) 03 MDL 1570 (GBD)(FM)) ECF Case))

This document relates to: ALL ACTIONS

STIPULATION ORDER GOVERNING IDENTIFICATION OF PRIVILEGED DOCUMENTS

WHEREAS, Magistrate Judge Maas has asked that the parties meet and confer regarding an agreement concerning the listing of privileged documents on a privilege log;

WHEREAS, the parties have conferred about this issue; and

WHEREAS, the parties wish to decrease the burdens associated with creating privilege logs concerning certain communications after the filing of the first complaint in the above-captioned litigation on August 15, 2002;

IT IS HEREBY AGREED by Plaintiffs and the remaining Defendants in the above-captioned action that:

- 1. The parties need not include the following types of documents on privilege logs in this matter:
 - (i) Communication between (i) plaintiffs' counsel and their clients, including then-current officers and employees of the clients, after September 10, 2001; and (ii) each defendant's counsel and that counsel's client(s), including then-current officers and employees of the client(s), after September 10, 2001; Any defendant asserting that its duty to preserve evidence did not attach until after September 11, 2001, shall identify in its privilege log any communications with counsel for which it is claiming privilege between September 10, 2001 and the date on which the defendant claims that its duty to preserve evidence attached;

- (ii) Communications between or among plaintiffs' counsel;
- (iii)Communications between or among defense counsel to the extent that such communications were within the specific authority that the Court recognized for the Defendants' Executive Committee in Case Management Order # 5 (D.E. 1547, filed December 9, 2005), namely:
 - To confer and agree with the Plaintiffs' Executive Committees on scheduling matters relating to court hearings, depositions, and deadlines affecting Defendants generally, and on proposed agenda items for court hearings;
 - To coordinate communications with counsel for any Plaintiff seeking the consent of Defendants generally to a nondispositive motion;
 - To coordinate the examination of witnesses by defense counsel at a deposition or hearing; and
 - To coordinate communications with Plaintiffs' Executive Committees and with the Court concerning any requested changes in this Case Management and Pretrial Scheduling Order;
- (iv) Pursuant to Fed. R. Civ. Proc. 26(b)(3)(A) and (B) and 26(b)(4)(B) and (C), drafts of any expert reports or disclosures required under Rule 26(a)(2), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);
- (v) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(C), all protected communications between a party's counsel and any witness required to provide a report under Rule 26(a)(2)(B), except to the extent that the communications fall within the categories described in Rule 26(b)(4)(C)(i), (ii), or (iii), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);
- (vi)Pursuant to Fed. R. Civ. Proc. 26(b)(4)(D), any facts known or opinions held by an expert who has been retained or specially employed by another party in anticipation of litigation or to prepare for trial and who is not expected to be called as a witness at trial, except as such discovery is permitted under Rule 26(b)(4)(D)(i) and (ii); and
- (vii) Such other categories that the parties may agree upon or the court may order as discovery proceeds (i.e., this stipulation order has been

entered based on the status of existing discovery requests and additional categories of exclusion may be added as discovery continues to unfold); and

- 2. For the purpose of the foregoing paragraph, the term "counsel" includes the parties' attorneys, and the attorneys' staff, employees, and consultants or experts not anticipated to testify at trial; and
- 3. To the extent that a party seeks to claim privilege or protection over a category of documents, rather than on a document-by-document basis, the parties shall meet and confer at least fourteen days before the privilege log is due in an effort to determine the categories of documents to be withheld:
 - (i) During the meet and confer, the withholding party shall set forth (a) a description of the proposed category, including a description of the general subject matter of the documents in each such category, (b) the basis for the withholding of documents in each such category, and (c) to the extent possible, the withholding party shall provide an objective index of readily available information about the documents in the category to aid the parties in understanding the universe of documents at issue (e.g., authors, recipients, dates, bates numbers, file size, etc.);
 - (ii) For each proposed category, the requesting party may request or the producing party may offer an affidavit attesting to the facts that support the privileged or protected status of documents within the category; The affidavit need not identify or address the documents on an individual basis, but shall serve to provide the evidentiary context and support for the category as a whole;
 - (iii)Unless and until the Court determines otherwise, under the authority of Rule 502(d), the sharing of information in the meet and confer process conducted pursuant to Paragraph 2 regarding documents that are claimed to be privileged or otherwise protected is to be held confidential and will not be deemed a waiver of any privileges, and the intentional or inadvertent inclusion of privileged in an index or privilege log will not be deemed a waiver of any privileges;
 - (iv) To the extent the parties can agree that a category may be excluded from production, the parties will submit a joint proposal to amend this stipulation order to add the category to paragraph 1;

- (v) To the extent the parties cannot agree that a category may be excluded and the producing party continues to assert in good faith a claim of privilege or protection over the category, the producing party shall present the discovery dispute for the court's consideration within five business days of either party's determination that the meet and confer has concluded, and the requesting party may respond to the application within five business days; and
- 4. The parties shall produce privilege logs no longer than 45 days from the state of the Court's entry of this Stipulation for any privileged documents withheld from the production due on August 30, 2012, and the parties shall produce privilege logs for any future productions within 45 days following such production; and
- 5. Subject to the foregoing modifications, the parties shall produce privilege logs that conform to the Federal Rules of Civil Procedure and Local Rule 26.2 (2012), and to the extent that divulgence of such information does not cause disclosure of the allegedly privileged information, shall identify the following information:
 - (i) Unique document identification number (e.g., bates numbers);
 - (ii) Document type (e.g., letter or memorandum);
 - (iii)General subject matter of the document;
 - (iv)Document length and, where applicable, file size;
 - (v) Identification and description of attachments;
 - (vi)Date (in Western format);
 - (vii) Author;
 - (viii) Copyees and/or Addressees;
 - (ix)Other Recipients;
 - (x) Description of the relationship of the author, copyees/addressees, and recipients to each other;
 - (xi)Categories;
 - (xii) The basis for the claimed privileges or protections and, if the privilege is governed by state law, indicate the state's privilege rule being invoked, including information sufficient to establish the elements of each asserted privilege invoked, or protection meeting agreed-upon criteria; and
- 6. Instructions for inclusion of certain items of information: To the extent that any of the following categories of information are included on a privilege log, the following instructions shall apply:

- (i) E-mail strings: The parties shall include the "last-in-time" email in a string provided that (a) each separate communication in the chain is at some point the "last-in-time" e-mail in a string, and (b) the index or privilege log notes that the e-mail communication is part of a string. If an embedded e-mail communication is not otherwise available, then it must be identified and included. To the extent that a portion of a string is produced (no privilege or protection is claimed), that portion of the string need not be separately included in the privilege log;
- (ii) Attachments: Attachments to emails and other documents should be identified as attachments and separately included with an indication as to which email or document said attachment(s) were attached.

THE MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES
THE DEFENDANTS' EXECUTIVE COMMITTEE

SO ORDERED:

This ____ day of October 2012

Magistrate Judge Frank Maas

Exhibit B

UNITED	STATES DISTRICT COURT	
SOUTHE	RN DISTRICT OF NEW YORK	<

In re Terrorist Attacks on September 11, 2001

) 03 MDL 1570 (GBD)(FM)

) ECF Case

)

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STIPULATION ORDER GOVERNING IDENTIFICATION OF PRIVILEGED DOCUMENTS

WHEREAS, Magistrate Judge Maas has asked that the parties meet and confer regarding an agreement concerning the listing of privileged documents on a privilege log;

WHEREAS, the parties have conferred about this issue; and

WHEREAS, the parties wish to decrease the burdens associated with creating privilege logs concerning certain communications after the filing of the first complaint in the above-captioned litigation on August 15, 2002;

IT IS HEREBY AGREED by Plaintiffs and the remaining Defendants in the above-captioned action that:

- 1. The parties need not include the following types of documents on privilege logs in this matter:
 - (i) Communication between (i) plaintiffs' counsel and their clients, including then-current officers and employees of the clients, after September 10, 2001; and (ii) each defendant's counsel and that counsel's client(s), including then-current officers and employees of the client(s), after September 10, 2001; Any defendant asserting that its duty to preserve evidence did not attach until after September 11, 2001, shall identify in its privilege log any communications with counsel for which it is claiming privilege between September 10, 2001 and the date on which the defendant claims that its duty to preserve evidence attached.

Comment [A1]: There needs to be consistency between a defendant's position on this issue and its position on the date a duty to preserve evidence attached. For example, if a defendant argues that its duty to preserve evidence attaches later, then the privilege should not attach until that time either.

One solution might be to add the following language to what has been proposed for 1.(i):

"Any defendant asserting that its duty to preserve evidence did not attach until after September 11, 2001, shall identify in its privilege log any communications with counsel for which it is claiming privilege between September 10, 2001 and the date on which the defendant claims that its duty to preserve evidence attached."

- (ii) Communications between or among plaintiffs' counsel;
- (iii)Communications between or among defense counsel—to the extent that such communications were within the specific authority that the Court recognized for the Defendants' Executive Committee in Case Management Order # 5 (D.E. 1547, filed December 9, 2005), namely:
 - To confer and agree with the Plaintiffs' Executive Committees on scheduling matters relating to court hearings, depositions, and deadlines affecting Defendants generally, and on proposed agenda items for court hearings;
 - To coordinate communications with counsel for any Plaintiff seeking the consent of Defendants generally to a nondispositive motion;
 - To coordinate the examination of witnesses by defense counsel at a deposition or hearing; and
 - To coordinate communications with Plaintiffs' Executive Committees and with the Court concerning any requested changes in this Case Management and Pretrial Scheduling Order;
- (iii) (iv) Pursuant to Fed. R. Civ. Proc. 26(b)(3)(A) and (B) and 26(b)(4)(B) and (C), drafts of any expert reports or disclosures required under Rule 26(a)(2), unless otherwise discoverable under Fed. R. Civ. P. ² 26(b)(3)(A)(i), (ii);
- (iv)(v) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(C), all protected communications between a party's counsel and any witness required to provide a report under Rule 26(a)(2)(B), except to the extent that the communications fall within the categories described in Rule 26(b)(4)(C)(i), (ii), or (iii), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);
- (+)(vi) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(D), any facts known or opinions held by an expert who has been retained or specially employed by another party in anticipation of litigation or to prepare for trial and who is not expected to be called as a witness at trial, except as such discovery is permitted under Rule 26(b)(4)(D)(i) and (ii); and

Comment [A2]: Although plaintiffs have asked, defendants have offered little explanation as to why communications among defendants counsed should be privileged. In recent discussions, defense counsel explained that, to the extent that they communicated among members of the Defendants' Executive Committees as directed by the Court (e.g., to draft coordinated discovery requests, to propose agenda items), those communications should enjoy the privilege.

Since the outset of this litigation, defendants have emphasized the varying interests of each of the defendants and used those varying interests as a premise to resist the organizational structure and authority of the DEC. Only after plaintiffs complained about the inability to coordinate even minor procedural matters with the defendants, the defendants crafted their own CMO that specifically and strictly limited the authority of the DEC to four terms specifically set out in the CMO. The order, crafted by the defendants, even states that aside from these four areas of authority, the DEC shall have "no other authority." See CMO #5, Docket Entry # 1547, (filed December 9, 2005).

The limited responsibilities authorized in CMO # 5 stands in stark contrast with the broad obligations and authority the Court imposed on the PBCs in CMO #3, Docket Entry # 248 (filed June 16, 2004). In CMO # 3, the Court authorized the PECs to fulfill its responsibilities by conducting a wide range of tasks, concluding with the authority to "otherwise coordinate the work of plaintiffs' counsel and perform such other functions as necessary and appropriate to complete pretrial proceedings in [03 MDL 1570] as may be authorized by the Court.

Although defense counsel have expressed division among themselves and resisted the same type of coordination that the plaintiffs' counsel have agreed to, plaintiffs are willing to compromise to exclude from the log those communications among defendants' counsel which are within the authorizations described in CMO # 5, paragraph 1.(a) to 1.(d).

Plaintiffs recommend that, to the extent that defendants would like a broader recognition of the privilege, they make an application to the court to fully brief the issue.

- (vii) Such other categories that the parties may agree upon or the court may order as discovery proceeds (i.e., this stipulation order has been entered based on the status of existing discovery requests and additional categories of exclusion may be added as discovery continues to unfold); and
- 2. For the purpose of the foregoing paragraph, the term "counsel" includes the parties' attorneys, and the attorneys' staff, employees, and consultants or experts not anticipated to testify at trial; and
- 3. To the extent that a party seeks to claim privilege or protection over a category of documents, rather than on a document-by-document basis, the parties shall meet and confer at least fourteen days before the privilege log is due in an effort to determine the categories of documents to be withheld:
 - (i) During the meet and confer, the withholding party shall set forth (a) a description of the proposed category, including a description of the general subject matter of the documents in each such category, (b) the basis for the withholding of documents in each such category, and (c) to the extent possible, the withholding party shall provide an objective index of readily available information about the documents in the category to aid the parties in understanding the universe of documents at issue (e.g., authors, recipients, dates, bates numbers, file size, etc.);
 - (ii) For each proposed category, the requesting party may request or the producing party may offer an affidavit attesting to the facts that support the privileged or protected status of documents within the category; The affidavit need not identify or address the documents on an individual basis, but shall serve to provide the evidentiary context and support for the category as a whole;
 - (iii)Unless and until the Court determines otherwise, under the authority of Rule 502(d), the sharing of information in the meet and confer process conducted pursuant to Paragraph 2 regarding documents that are claimed to be privileged or otherwise protected is to be held confidential and will not be deemed a waiver of any privileges, and the intentional or inadvertent inclusion of privileged in an index or privilege log will not be deemed a waiver of any privileges;
 - (iv)To the extent the parties can agree that a category may be excluded from production, the parties will submit a joint proposal to amend this stipulation order to add the category to paragraph 1;

Comment [A3]: This provision is part of what was suggested in Judge Facciola's law review articles Bee John M. Facciola and Jonathan M. Redgrave, Asserting and Challenging Privilege Claims in Modern Litigation: The Facciola-Redgrave Framework, Federal Courts L. Rev. Vol. 4, Issue 1, at 48-49 (hereinafter "Facciola").

The provision is essential to minimize the number of disputes and to enable the parties to engage in a meaningful M&C dialogue as to how a claimed privilege is supportable.

- (v) To the extent the parties cannot agree that a category may be excluded and the producing party continues to assert in good faith a claim of privilege or protection over the category, the producing party shall present the discovery dispute for the court's consideration within five business days of either party's determination that the meet and confer has concluded, and the requesting party may respond to the application within five business days; and
- 4. The parties shall produce privilege logs no longer than 45 days from the state of the Court's entry of this Stipulation for any privileged documents withheld from the production due on August 30, 2012, and the parties shall produce privilege logs for any future productions within 45 days following such production; and
- 5. Subject to the foregoing modifications, the parties shall produce privilege logs that conform to the Federal Rules of Civil Procedure and Local Rule 26.2 (2012), and to the extent that divulgence of such information does not cause disclosure of the allegedly privileged information, shall identify the following information:
 - (i) Unique document identification number (e.g., bates numbers);
 - (ii) Document type (e.g., letter or memorandum);
 - (iii)General subject matter of the document;
 - (iv) Document length and, where applicable, file size;
 - (v) Identification and description of attachments;
 - (vi)Date (in Western format);
 - (vii) Author;
 - (viii) Copyees and/or Addressees;
 - (ix)Other Recipients;
 - (x) Description of the relationship of the author, copyees/addressees, and recipients to each other;
 - (xi) Categories:
 - (xii) The basis for the claimed privileges or protections and, if the privilege is governed by state law, indicate the state's privilege rule being invoked, including information sufficient to establish the elements of each asserted privilege invoked, or protection meeting agreed-upon criteria; and
- 6. Instructions for inclusion of certain items of information: To the extent that any of the following categories of information are included on a privilege log, the following instructions shall apply:

Comment [A4]: This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to facilitate the parties' and the court's review and assessment.

Comment [A5]: This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to help define disputes and to facilitate the parties' and the court's review and

Comment [A6]: This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to help define disputes and to facilitate the parties' and the court's review and assessment.

Comment [A7]: To the extent that the date on the document is depicted in non-Western format (e.g., a Hijra date), in addition to providing the date depicted in the document, a Western date (i.e., Gregorian date) should be provided in the log where it is possible to discern that date.

Comment [A8]: This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to help define disputes and to facilitate the parties' and the court's review and assessment.

Comment [A9]: This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to help define disputes and to facilitate the parties' and the court's review and

string provided the some point the "privilege log notes not necessary to so is privileged. If available, then it portion of a string	The parties shall include the "last-in-time" email in a at (a) each separate communication in the chain is at last-in-time" e-mail in a string, and (b) the index or a that the e-mail communication is part of a string. It is apparately index each e-mail in a string if the entire string an embedded e-mail communication is not otherwise must be identified and included. To the extent that a is produced (no privilege or protection is claimed), that up need not be separately included in the privilege log;
(ii) Attachments: Att	achments to emails and other documents should be himents and separately included with an indication as to cument said attachment(s) were attached.
	THE MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES
	THE DEFENDANTS' EXECUTIVE COMMITTEE
October 2012	

Comment [A10]: This item is stated as suggested for inclusion in Facciola at 48-49. Since each email entry is a séparate "document," which (for example) may have been to, from, or cc'd to a non-privilege person, each needs to be separately logged for consideration, and enable the parties to engage in dialogue about the validity of privilege claims and provide the court with sufficient indicia as to the validity of the claim.

It is important to help define disputes and to facilitate the parties' and the court's review and

Comment [A11]: The phrasing suggested comes from the language in Judge Facciola's law review article. See Facciola. Vol. 4, Issue 1, at 49.

It is important to help define disputes and to facilitate the parties' and the court's review and assessment.

SO ORDERED:

This ____ day of October 2012

Magistrate Judge Frank Maas

Exhibit C

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> Kreindler & Kreindler LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> Hanly, Conroy Bierstein Sheridan Fisher & Hayes LLP	J. Scott Tarbutton, <i>Liaison Connsel</i> COZEN O'CONNOR

VIA Electronic Mail

August 3, 2012

Alan R. Kabat, Esq. BERNABEI & WACHTEL, PLLC 1775 T Street, NW Washington, DC 20009-7124

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)

Dear Mr. Kabat:

Attached for discussion purposes is plaintiffs' initial proposal for a stipulation regarding the privilege log. Although we are sending this to you now for discussion purposes, we anticipate that we may have several additional suggestions that we have not quite finished thinking through; but to help us start the process we are offering the attached. Please circulate our proposal among your side and let us know a convenient time to meet and confer about the issue.

In addition, because the tone of each of your emails about the stipulation has implied some urgency or impatience about the progress of this project, we wanted to address that tone. Because I understand that Clifford Chance played some role in drafting your proposal and that at least some of the other defendants have encouraged you to pressure plaintiffs since you sent your proposal, our comments here are not necessarily intended to be directed at you, Alan, alone. But for a variety of reasons, we take issue with the tone of your emails and the implication that the chain in your last email accurately represents the history and current state of the negotiations about this stipulation.

As you know, defendants took on the responsibility of drafting a proposal for plaintiffs' consideration at least as early as our video conference meet and confer in March 2011. We never got any proposal for consideration until you provided something for us to consider in March 2012. So perhaps you can understand our view that the comment in your last email that "it should not take anyone four months to address this issue" comes off a bit ironic to us. Your email is misleading in that it implies that the starting point of our discussions concerning the stipulation dates back to only late March 2012, when in reality there was a full one-year gap where plaintiffs were waiting for a proposal from the defendants.

Alan R. Kabat, Esq. August 3, 2012 Page 2

Moreover, we also find it a bit ironic, and quite concerning, that the parties complaining that plaintiffs are somehow untimely in responding to defendants' proposed stipulation, are, themselves, egregiously behind in their own discovery obligations. Because, by and large, defendants have failed to demonstrate even a good faith effort to engage in rolling productions consistent with Judge Maas's directions, they should focus much more sharply on completing discovery, rather than demanding that plaintiffs stipulate concerning a log that will not need to be completed until sometime after the initial production deadline.

As we have expressed all along, we agree that the stipulation concerning the log needs to be done, but the continued insistence that it take priority over other obligations is not a position to which we have subscribed. To add some perspective to your sense of urgency — consider that when you first sent your proposal, a year after initially discussed, the close of initial document production was scheduled for late April 2012. Since then, that date has been moved to late August. And any obligations to produce a log would not begin until some agreed upon time after that date.

Plaintiffs also take exception to your characterization that plaintiffs have "delayed" responding to your proposal. First, as we have explained in our several exchanges, in the interim since receipt of your proposal in April, several other obligations took priority, not the least of which was substantial appellate briefing in this litigation. Second, while we would have anticipated that the year-long effort to produce a stipulation would have afforded defendants ample time to address the concerns Judge Maas raised during the April 12, 2011 discovery conference, we do not believe that your proposal did so. According, rather than simply commenting on what you proposed, we had to essentially re-write the proposal more or less from scratch. In addition to offering our proposal, we are also providing you with a copy of the article that Judge Maas commended to our attention during that hearing. We have tried to incorporate into our proposal the aspects from the article that we found most appropriate for our case.

Thank you for your efforts to reach an amicable agreement regarding this stipulation. After you have had an opportunity to discuss this proposal with your colleagues, we would ask that you provide us with suggested dates to meet and confer in sufficient advance to enable us to circulate to those on our side who may wish to participate. In addition, to the extent that we have additional revisions to this proposal, we will forward them to your attention.

Sincerely,

THE MDL 1570 PLAINTIFFS' EXECUTIVE

COMMITTEES

cc: Jodi Westbrook Flowers, Esq. (Via Electronic Mail)
Sean P. Carter, Esq. (Via Electronic Mail)
J. Scott Tarbutton, Esq. (Via Electronic Mail)
John M. Eubanks, Esq. (Via Electronic Mail)
James P. Kreindler, Esq. (Via Electronic Mail)
Andrew J. Maloney, Esq. (Via Electronic Mail)
Jerry S. Goldman, Esq. (Via Electronic Mail)

Exhibit D

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> Kreindler & Kreindler llp Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> Hanly Conkoy Bierstein Sheridan Fisher & Hayes llp	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA Electronic Mail

October 16, 2012

Alan R. Kabat, Esq. BERNABEI & WACHTEL, PLLC 1775 T Street, NW Washington, DC 20009-7124

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)

Dear Mr. Kabat:

In response to the proposal that you sent to us on October 3, 2012, attached are plaintiffs' comments about the proposed stipulation concerning a privilege log. As you can see from the comments, we have two generally overarching concerns.

First, when we sent you our proposal on August 3, we were clear that much of what we added was added after considering the *Facciola-Redgrave* framework that Judge Maas recommended that we consider. Although you have opted to delete much of what was added from that framework, you have not explained why we should not employ the framework that the Court suggested.

Second, You have not responded to our specific request that you explain why the communications among defendants' counsel, who have worked largely independent of one another and have identified diverging interests, would be subject to a privilege. Instead of offering any explanation, you have merely pointed out that counsel for certain plaintiffs who have never had claims against the active defendants have worked apart from the PECs. The misleading anecdotal example, which ignores the constant close coordination among the PECs, does nothing to explain why the privilege suggested should be recognized.

We suggest that you take a second review of the proposal and either offer explanations for the items where explanation is requested, accept the language as we have proposed, or suggest substitute language with an explanation as to why the substitute is better.

Sincerely,

/S/

ROBERT T. HAEFELE FOR THE MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

cc: Jodi Westbrook Flowers, Esq. (Via Electronic Mail) Sean P. Carter, Esq. (Via Electronic Mail) Alan R. Kabat, Esq. October 16, 2012 Page 2

> J. Scott Tarbutton, Esq. (Via Electronic Mail) John M. Eubanks, Esq. (Via Electronic Mail) James P. Kreindler, Esq. (Via Electronic Mail) Andrew J. Maloney, Esq. (Via Electronic Mail) Jerry S. Goldman, Esq. (Via Electronic Mail)

EXHIBIT 2

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #:
In re Terrorist Attacks on September 11, 2001) DATE FILED: 11 19 2012) 03 MDL 1570 (GBD)(FM)) ECF Case)

This document relates to: ALL ACTIONS

ORDER GOVERNING IDENTIFICATION OF PRIVILEGED DOCUMENTS

WHEREAS, the Court has conferred with counsel concerning the listing of privileged documents on a privilege log; and

WHEREAS, the Court has considered counsel's competing positions concerning certain portions of a proposed order relating to that subject;

IT IS HEREBY ORDERED that:

- 1. The parties need not include the following types of documents on privilege logs in this matter:
 - (i) Communication between (i) plaintiffs' counsel and their clients, including then-current officers and employees of the clients, after September 10, 2001; and (ii) each defendant's counsel and that counsel's client(s), including then-current officers and employees of the client(s), after September 10, 2001;
 - (ii) Communications between or among plaintiffs' counsel;
 - (iii) Communications between or among defense counsel;
 - (iv)Pursuant to Fed. R. Civ. Proc. 26(b)(3)(A) and (B) and 26(b)(4)(B) and (C), drafts of any expert reports or disclosures required under Rule

- 26(a)(2), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);
- (v) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(C), all protected communications between a party's counsel and any witness required to provide a report under Rule 26(a)(2)(B), except to the extent that the communications fall within the categories described in Rule 26(b)(4)(C)(i), (ii), or (iii), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);
- (vi)Pursuant to Fed. R. Civ. Proc. 26(b)(4)(D), any facts known or opinions held by an expert who has been retained or specially employed by another party in anticipation of litigation or to prepare for trial and who is not expected to be called as a witness at trial, except as such discovery is permitted under Rule 26(b)(4)(D)(i) and (ii); and
- (vii) Such other categories as the parties may agree upon or the court may order as discovery proceeds (*i.e.*, this stipulation order has been entered based on the status of existing discovery requests and additional categories of exclusion may be added as discovery continues to unfold).
- 2. For the purpose of the foregoing paragraph, the term "counsel" includes the parties' attorneys, and the attorneys' staff, employees, and consultants or experts not anticipated to testify at trial.
- 3. To the extent that a party seeks to claim privilege or protection over a category of documents, rather than on a document-by-document basis, the parties shall meet and confer at least fourteen days before the privilege log is due in an effort to determine the categories of documents to be withheld:
 - (i) During the meet and confer, the withholding party shall set forth (a) a description of the proposed category, including a description of the general subject matter of the documents in each such category, and (b) the basis for the withholding of documents in each such category;
 - (ii) For each proposed category, the requesting party may request or the producing party may offer an affidavit attesting to the facts that support the privileged or protected status of documents within the category; The affidavit need not identify or address the documents on an individual basis, but shall serve to provide the evidentiary context and support for the category as a whole;

- (iii)Unless and until the Court determines otherwise, under the authority of Rule 502(d), the sharing of information in the meet and confer process conducted pursuant to Paragraph 2 regarding documents that are claimed to be privileged or otherwise protected is to be held confidential and will not be deemed a waiver of any privileges, and the intentional or inadvertent inclusion of privileged in an index or privilege log will not be deemed a waiver of any privileges;
- (iv)To the extent the parties can agree that a category may be excluded from production, the parties will submit a joint proposal to amend this stipulation order to add the category to paragraph 1;
- (v) To the extent the parties cannot agree that a category may be excluded and the producing party continues to assert in good faith a claim of privilege or protection over the category, the producing party shall present the discovery dispute for the court's consideration within five business days of either party's determination that the meet and confer has concluded, and the requesting party may respond to the application within five business days.
- 4. The parties shall produce privilege logs no longer than 45 days from the state of the Court's entry of this Stipulation for any privileged documents withheld from the production due on August 30, 2012, and the parties shall produce privilege logs for any future productions within 45 days following such production.
- ⁵5. Subject to the foregoing modifications, the parties shall produce privilege logs that conform to the Federal Rules of Civil Procedure and Local Rule 26.2 (2012), and to the extent that divulgence of such information does not cause disclosure of the allegedly privileged information, shall identify the following information:
 - (i) the type of document;
 - (ii) the general subject matter of the document;
 - (iii)the date of the document
 - (iv) the authors of the document, the addressees of the document and any other recipients, and, where not apparent, the relationship of the authors, addressees, and recipients to one another; and
 - (v) if the document is an electronic document, its file size.
- 6. The basis for the privileges or protections claimed, and, if the privilege is governed by state law, the state's privilege rule being invoked.

- 7. Instructions for inclusion of certain items of information: To the extent that any of the following categories of information are included on a privilege log, the following instructions shall apply:
 - (i) E-mail strings: The parties shall include the "last-in-time" email in a string provided that (a) each separate communication in the chain is at some point the "last-in-time" e-mail in a string, and (b) the index or privilege log notes that the e-mail communication is part of a string. It is not necessary to index separately each e-mail in a string if the authors and addressees are unchanged throughout the string. If an embedded e-mail communication is not otherwise available, then it must be identified and included. To the extent that a portion of a string is produced (no privilege or protection is claimed), that portion of the string need not be separately included in the privilege log;
 - (ii) Attachments: Attachments to emails and other documents should be identified as attachments and included in the entry for the email or other document to which said attachment(s) were attached.

SO ORDERED:

This 19th day of November 2012

FRANK MAAS

United States Magistrate Judge

EXHIBIT 3

03-MDL-1570 Plaintiffs' Executive Committees' Privilege Log

	Doc Type:	Doc Date:	Title Ref (Description:	Author Name.	Rocinionte:	Email String:	Attachmonte: Eilo Cizo:	Eilo Ciao.	oriving (Drotton)
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			Alab bank internal uccument produced in Linge, et						Order dated August 1, 2005, in
		and the second	al. V. Arab ballk, PLC, case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
	+		2/99(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
-	Wire Iranster		3/15/1995 ABPLC212255			No	No	48 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
7	Wire Transfer	_	4/11/1995 ABPLC212256			No	S _o	48 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
	1		2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
23	Wire Transfer		10/27/1995 ABPLC212257			Š	N _o	48 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-					_	Linde, et al. v. Arab Bank, PLC.
	Account		2799(NG)(VVP) and related cases with bates number					_	Case No. 04-CV-2799(NG)(VVP)
4	Statement	12/29/1995	12/29/1995 ABPLC009874			ž	No	88 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number					_	Case No. 04-CV-2799(NG)(VVP)
5	Wire Transfer	3/28/1996	3/28/1996 ABPLC215855			Š	No No	64 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank Internal document produced in Linde, et						Order dated August 1, 2005, in
			al. V. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
9	Wire Iranster	4/8/1996	4/8/1996 ABPLC212259			No No	2	47 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
	H	-	2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
,	Wire Iranster	4/15/1996	4/15/1996 ABPLC212258			N _o	S _O	48 KB	and related cases.
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
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œ.	Wire Iransfer	╛	7/22/1996 ABPLC211756			No	No	45 KB	and related cases.

Page 1 of 75

03-MDL-1570 Plaintiffs' Executive Committees' Privilege Log

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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	String:	Attachments: File Size:	File Size:	
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
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o	Wire Transfer	_	7/24/1996 ABPLC212260			ş	No	50 KB	and related cases.
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10	Wire Transfer	9/18/1996	9/18/1996 ABPLC212261			No	No	50 KB	and related cases.
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11	Wire Transfer	9/18/1996	9/18/1996 ABPLC212262			8	⁸	48 KB	and related cases.
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12	Wire Transfer		11/26/1996 ABPLC211757			Š	§.	45 KB	and related cases.
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13	Wire Transfer		11/26/1996 ABPLC211758			No No	2	49 KB	and related cases.
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15	Wire Transfer	_	12/12/1996 ABPLC212264			No	No	49 KB	and related cases.
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18	Wire Transfer	2/3/1997	2/3/1997 ABPLC212265			ş	S _e	49 KB	and related cases.
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21	Wire Transfer	2/25/1997	2/25/1997 ABPLC007062			2	No.	64 KB	and related cases.
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33	Wire Transfer		11/10/1997 ABPLC212484			8 S	S _o	46 KB	and related cases.
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34	Wire Transfer		1/2/1998 ABPLC212271			^o N	No	49 KB	and related cases.
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35	Wire Transfer		1/5/1998 ABPLC212189			8	No.	45 KB	and related cases.
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37	Wire Transfer		1/16/1998 ABPLC212273			S _O	N _o	50 KB	and related cases.
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38	Wire Transfer		1/27/1998 ABPLC192044			No	No	71 KB	and related cases.
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39	Wire Transfer	2/23/1998	2/23/1998 ABPLC212192			2	No No	46 KB	and related cases.
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40	Wire Transfer	2/24/1998	2/24/1998 ABPLC211796			<u>۶</u>	No No	45 KB	and related cases.

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41	Wire Transfer	3/10/1998	3/10/1998 ABPLC212988			2 2	2	47 KB	and related cases.
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42	Wire Transfer	3/10/1998	3/10/1998 ABPLC212989			2	2	46 KB	and related cases.
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43	Wire Transfer	3/25/1998	3/25/1998 ABPLC211795			Š	2	45 KB	and related cases.
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44	Wire Transfer	3/25/1998	3/25/1998 ABPLC212194			2	S _N	44 KB	and related cases.
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45	Wire Transfer	3/25/1998	3/25/1998 ABPLC212195			2	8	46 KB	and related cases.
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46	Wire Transfer	3/25/1998	3/25/1998 ABPLC212196			S _o	No	45 KB	and related cases.
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47	Wire Transfer	4/16/1998	4/16/1998 ABPLC211794			2	2	45 KB	and related cases.
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_	Wire Transfer	11/3/1998	11/3/1998 ABPLC007085			ž	No	62 KB	and related cases.	
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27	Wire Transfer	12/16/1998	12/16/1998 ABPLC211764			S N	No	43 KB	and related cases.
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28	Wire Transfer	12/21/1998	12/21/1998 ABPLC212986			No	No	31 KB	and related cases.
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29	Wire Transfer		12/21/1998 ABPLC007088	La representation		S N	No	62 KB	and related cases.
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09	Wire Transfer	12/24/1998	12/24/1998 ABPLC212203			Š	Se se	45 KB	and related cases.
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61	Wire Transfer	5/25/1999	5/25/1999 ABPLC212985			8 N	Š	31 KB	and related cases.
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62	Wire Transfer	5/26/1999	5/26/1999 ABPLC212711			No	No	51 KB	and related cases.
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63	Wire Transfer	7/19/1999	7/19/1999 ABPLC212274			N _o	Se Se	48 KB	and related cases.
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64	Wire Transfer		7/20/1999 ABPLC212275			No No	No	45 KB	and related cases.

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65	Wire Transfer	12/8/1999	12/8/1999 ABPLC211765			<u>گ</u>	2	45 KB	and related cases.
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99	Wire Transfer		12/13/1999 ABPLC007108			<u>گ</u>	Š	62 KB	and related cases.
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29	Wire Transfer		12/14/1999 ABPLC212949			2	2	30 KB	and related cases.
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89	Wire Transfer	1/19/2000	1/19/2000 ABPLC212984			8	⁸	31 KB	and related cases.
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69	Wire Transfer	1/19/2000	1/19/2000 ABPLC007109			<u>گ</u>	2	64 KB	and related cases.
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20	Wire Transfer	1/19/2000	1/19/2000 ABPLC212716			ž	2	50 KB	and related cases.
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71	Wire Transfer	2/10/2000	2/10/2000 ABPLC212206			ž	2	46 KB	and related cases.
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72	Wire Transfer	5/19/2000	5/19/2000 ABPLC212276			S S	No	48 KB	and related cases.

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73	Wire Transfer		6/27/2000 ABPLC212983			°N N	N _o	31 KB	and related cases.
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74	Wire Transfer	6/27/2000	6/27/2000 ABPLC007112			2	Š	64 KB	and related cases.
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75	Wire Transfer	7/25/200C	7/25/2000 ABPLC212277			ę	₽	48 KB	and related cases.
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
76	Report	8/24/200C		Osman Asoli	Abdul Majeed Shoman	ž	No No	2056 KB	and related cases.
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
77	Wire Transfer	9/1/2000	9/1/2000 ABPLC212252			2	No	49 KB	and related cases.
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			Arab Bank internal document produced in Linde, et		-				Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
78	Wire Transfer	9/12/2000	9/12/2000 ABPLC212207		-	Š	S _e	45 KB	and related cases.
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
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ļ			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
79	Wire Transfer	10/5/2000	10/5/2000 ABPLC212208			<u>۾</u>	<u>8</u>	48 KB	and related cases.
									Produced pursuant to Protective
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			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
ç			2799(NG)(WVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
80	Wire Iranster	_	10/6/2000 ABPLC215701			No	No	64 KB	and related cases.

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82	Wire Iranster	_	10/16/2000 ABPLC212981			S _o	No	32 KB	and related cases.
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
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83	Bank Record	10/16/2000	10/16/2000 ABPLC188951			_o N	No	127 KB	and related cases.
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84	Wire Transfer		10/26/2000 ABPLC212720			Š	S _o	30 KB	and related cases.
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82	Wire Transfer	10/26/2000	10/26/2000 ABPLC212982			No No	No No	32 KB	and related cases.
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92	Wire Iranster		11/28/2000 ABPLC212254			Š	No	48 KB	and related cases.
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87	Wire Transfer	_	11/28/2000 ABPLC212278	.,		No N	 8	49 KB	and related cases.
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89	Wire Transfer		11/30/2000 ABPLC212980			ž	8	30 KB	and related cases.
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06	Wire Transfer	\rightarrow	11/30/2000 ABPLC212721			No	No	48 KB	and related cases.
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91	Wire Transfer	1/19/2001	1/19/2001 ABPLC212961			Š	_S	31 KB	and related cases.
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92	Wire Transfer	1/19/2001	1/19/2001 ABPLC007118			S S	<u>Q</u>	65 KB	and related cases.
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93	Wire Transfer	1/19/2001	1/19/2001 ABPLC212723			8 N	No No	49 KB	and related cases.
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	1		2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
94	Wire Iranster	2/6/2001	2/6/2001 ABPLC2122/9			No	No	49 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank Internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(WP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
95	Wire Iranster	2/8/2001	2/8/2001 ABPLC211766			S N	No	46 KB	and related cases.
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			Arab Bank Internal document produced in Linde, et						Order dated August 1, 2005, in
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36	wire Iranster	_	2/16/2001 ABPLC211 /68			No	No	47 KB	and related cases.

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105	Wire Transfer	5/22/2001	5/22/2001 ABPLC007122			No	No	65 KB	and related cases.
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
106	Wire Transfer	5/22/2001	5/22/2001 ABPLC212727			No	No	49 KB	and related cases.
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
107	Wire Transfer	6/11/2001	6/11/2001 ABPLC212281			2 2	8	52 KB	and related cases.
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
108	Wire Transfer	6/11/2001	6/11/2001 ABPLC212282			2	No.	51 KB	and related cases.
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109	Wire Transfer	7/24/2001	7/24/2001 ABPLC212776			2	8	28 KB	and related cases.
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			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
110	Wire Transfer	7/24/2001	7/24/2001 ABPLC212777			ş	N _o	29 KB	and related cases.
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
111	Wire Transfer	7/24/2001	7/24/2001 ABPLC212778			2	2	28 KB	and related cases.
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112	Wire I ranster	7/25/2001	7/25/2001 ABPLC212283			S S	S S	48 KB	and related cases.

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113	Wire Transfer	8/8/2001	8/8/2001 ABPLC196927 - ABPLC196928			8 N	8	151 KB	and related cases.
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
114	Wire Transfer	9/10/2001	9/10/2001 ABPLC191333			8 N	2	53 KB	and related cases.
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
115	Report	9/10/2001	9/10/2001 ABPLC005507 - ABPLC005524		Abdul Majeed Shoman	<u>م</u>	⁸	1710 KB	and related cases.
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116	Wire Transfer		9/25/2001 ABPLC191337			⁸	8 8	62 KB	and related cases.
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			Arab Bank internal document produced in Linde, et				-		Order dated August 1, 2005, in
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117	Wire Transfer	10/1/2001	10/1/2001 ABPLC191324			8	_S	62 KB	and related cases.
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
118	Wire Transfer	10/4/2001	10/4/2001 ABPLC191325			8 2	<u>8</u>	62 KB	and related cases.
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
119	Wire Transfer	10/5/2001	10/5/2001 ABPLC212764			⁸	2	28 KB	and related cases.
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
120	Wire Transfer	10/9/2001	10/9/2001 ABPLC191328			ž	ş	54 KB	and related cases.

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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
121	Wire Transfer		10/18/2001 ABPLC212942		<u>8</u>	2		30 KB	and related cases.
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
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	Account		2799(NG)(WVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
122	Statement	10/21/2001	10/21/2001 ABPLC211300		No	ž		49 KB	and related cases.
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123	Wire Transfer	11/13/2001	11/13/2001 ABPLC007127	-	<u>N</u>	ž		62 KB	and related cases.
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
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124	vviic ilalisiei	11/14/2001	ADPLCZIZ890		ON.	2		30 KB	and related cases.
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			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
125	Wire Transfer	11/23/2001	11/23/2001 ABPLC212284		No	ž		49 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
126	Wire Transfer	11/23/2001	11/23/2001 ABPLC007128		<u>8</u>	2		64 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et				-		Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
127	Wire Transfer	12/4/2001	12/4/2001 ABPLC192047 - ABPLC192048		<u>8</u>	S		126 KB	and related cases.
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128	Wire Transfer	1/7/2002	1/7/2002 ABPLC212285		2	Ž		47 KB	and related cases.

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137	Wire Transfer		7/30/2002 ABPLC008729			8	N _o	46 KB	and related cases.	
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138	Letter	8/8/2002	8/8/2002 Correspondence re FOIA Request 2002-0195	US Department of Justice	Kreindler & Kreindler	no	yes	1389 KB	Attorney Work Product	_
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141	Letter	10/2/2002	10/2/2002 Disclosure Services, US Customs Services, and IRS	Ronald Motley	Internal Revenue	ž	Yes	158 KB	Attorney Work Product	
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142	Letter	10/2/2002	10/2/2002 Motley Rice FOIA request to FBI	Ronald Motley	Department of Justice	2	<u>د</u>	158 KB	Attorney Work Product	
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143	Letter	10/2/2002	10/2/2002 Disclosure Services, US Customs Services, and IRS Ronald L. Mottey	Ronald L. Motley	Request	ы	yes	158 KB	Attorney Work Product	
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144	Wire Transfer		11/1/2002 ABPLC212291			No No	Š	49 KB	and related cases.	
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145	Wire Transfer		11/15/2002 ABPLC212292			No.	No	42 KB	and related cases.	
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146	Wire Transfer		11/15/2002 ABPLC212293			٤	8	48 KB	and related cases.	
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147	Wire Transfer		12/4/2002 ABPLC212294			No No	No No	51 KB	and related cases.	
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148	Wire Transfer		3/10/2003 ABPLC196288			8 S	No	49 KB	and related cases.	_
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149	Wire Transfer		3/11/2003 ABPLC196289			N _o	No	54 KB	and related cases.	
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150	Wire Transfer	3/17/2003	3/17/2003 ABPLC196290			ş	S _o	46 KB	and related cases.	_
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151	Bank Note	4/1/2003	4/1/2003 ABPLC008982			2	No.	32 KB	and related cases.	
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721	Letter	4/15/2003	4/15/2003 Motiey Rice FUIA request to US Customs Service	Konald Motley	Service	No No	ON	163 KB	Attorney Work Product	_
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153	Letter	4/15/2003 Agency	Agency	Ronald Motley	Agency, ISM-1 (FOIA)	No	No	163 KB	Attorney Work Product	_
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159	Letter	4/15/2003	4/15/2003 Administration	Ronald Motley	Administration	No	No	163 KB	Attorney Work Product	-
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160	Letter	4/15/2003	4/15/2003 Resources Management Programs and Services	Ronald Motley	of State	٩	N _o	163 KB	Attorney Work Product	
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161	Letter	4/15/2003	4/15/2003 Resources Management Programs and Services	Ronald Motley	of State	No No	No No	67 KB	Attorney Work Product	
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162	Letter	4/15/2003	4/15/2003 Information Programs	Margaret P. Grafeld	Ronald Motley	No	No	76 KB	Attorney Work Product	
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164	Letter	4/15/2003	4/15/2003 Control (OFAC)	Ronald Motley	(OFAC)	No	No	163 KB	Attorney Work Product	
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165	Letter	4/15/2003	4/15/2003 Disclosure Services	Ronald Motley	Treasury	Š	Yes	221 KB	Attomev Work Product	
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166	Letter	4/15/2003	4/15/2003 Motley Rice FOIA request to US Customs Services	Ronald Motley	Service	% S	Yes	239 KB	Attorney Work Product	
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167	Letter	4/15/2003	4/15/2003 Motley Rice FOIA request to Disclosure Services	Ronald Motley	Treasury	§.	S.	163 KB	Attorney Work Product	
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168	Letter "	4/15/2003	4/15/2003 Enforcement Network (FinCEN)	Ronald Motley	Network (FinCen)	No	No	163 KB	Attorney Work Product	_

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170	Letter	4/15/2003	4/15/2003 Motley Rice FOIA request to FBI	Ronald Motley	Department of Justice	on O	no	81 KB	Attorney Work Product	
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171	Letter	4/15/2003	4/15/2003 Motley Rice FOIA request to FBI	Ronald Motley	of Justice	ou	2	163 KB	Attorney Work Product	
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172	Letter	4/15/2003	4/15/2003 Motley Rice FOIA request to FBI	Ronald L. Motley	Department of Justice	2	01	81 KB	Attorney Work Product	
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173	Letter	4/15/2003 Agency	Agency	Ronald L. Motley	Agency	ou	2	163 KB	Attorney Work Product	
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174	Letter	4/15/2003 Agency	Agency	Ronald L. Motley	Agency	20	2	163 KB	Attorney Work Product	
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175	Leffer	4/15/2003	4/15/2003 Department	Ronald I Mottey	Department of Justice	2	2	163 KB	Aftorney Work Product	
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176	Letter	4/15/2003	4/15/2003 Department	Ronald L. Mottev	Department of Justice	01	20	163 KB	Attorney Work Product	
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177	Letter	4/15/2003	4/15/2003 Administration	Ronald L. Motley	Department of Justice	2	n or	163 KB	Attorney Work Product	
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178	Letter	4/15/2003	4/15/2003 Department	Ronald L. Motley	Management Division	01	00	163 KB	Attorney Work Product	_
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179	Letter	4/16/2003	4/16/2003 Disclosure Services	Ronald Motley	Treasury	^o N	N _o	64 KB	Attorney Work Product	_
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			Motley Rice FOIA request to Dept of Treasury,		Department of the					_
180	Letter	4/16/2003	4/16/2003 Disclosure Services	Ronald Motley	Treasury	°N	S _o	64 KB	Attorney Work Product	_
					U.S. Department of the					_
					Treasury, Financial					_
			Motley Rice FOIA request to Financial Crimes		Crimes Enforcement					
181	Letter	4/16/2003	4/16/2003 Enforcement Network (FinCEN)	Ronald Motley	Network (FinCen)	Š.	No	64 KB	Attorney Work Product	

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							-		Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde et al. v. Arab Bank. PLC.
			2799(NG)(VVP) and related cases with hates number						Case No 04-CV-2799(NG)(VVP)
0	Wind Transfer		A D D C 400004			1	-	27.07	
781	vvire Iransier	_	4/1//Z003/ABPLC196291			0	2	46 KB	and related cases.
	1				United states customs	-		2	6
183	Letter	4/18/2003	4/18/2003 Motiey Rice FOIA request to US Customs Service	Konald Motley	Service	02	OZ.	81 KB	Attorney Work Product
					Marie A O'Rourke				
					Assistant Director				
					TOTA (Delicated)				
-					FOIAVPIIVACY UNIT,				
					Executive Office for				
*****			Motley Rice FOIA request to Executive Office for		United States Attorneys,				
184	Letter	4/18/2003	4/18/2003 United States Attorneys	Ronald Motley	Department of Justice	²	⁸	81 KB	Attorney Work Product
					Margaret P. Grafeld,				
					Information and Privacy				
			Mother, Dies FOIA section of the Contract of Information		Control Distriction				
					Coordinator, Department				
185	Letter	4/18/2003	4/18/2003 Resources Management Programs and Services	Ronald Motley	of State	2	^S	81 KB	Attorney Work Product
					Disclosure Services,				
			Motley Rice FOIA request to Dept of Treasury,		Department of the				
186	Letter	4/18/2003		Ronald Motley	Treasury	Š	8	84 KB	Attorney Work Product
					Disclosure Services,				
			Motley Rice FOIA reguest to Dent of Treasury		Department of the			_	
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			-		Embassy of the United				
					States of America, Abou				
188	Letter	4/18/2003	4/18/2003 Motley Rice FOIA request to US Embassy-Syria	Ronald L. Motley	Roumaneh	2	92	81 KB	Attorney Work Product
					US Customs Service				
					Freedom of Information			_	
189	Letter	4/18/2003	4/18/2003 Motley Rice FOIA request to US Customs Services F	Ronald L. Motlev	Reguest	2	2	81 KB	Attorney Work Product
			T	,	Departmental Offices.				
					Disclosure Services,			_	
			Motley Rice FOIA request to Dept of Treasury,		Department of the				i.
190	Letter	4/18/2003		Ronald L. Motlev	Treasury	2	00	84 KB	Attorney Work Product
				f	Marie A O'Rourke				
					Assistance Director.				
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Ş	1	00000	st to executive Office for		US Attorneys,			<u> </u>	
191	Letter	4/18/2003		Konald L. Motiey	Department of Justice	2	2	81 KB	Attorney work Product
192	Letter *	4/23/2003	Detense Intelligence Agency response to Mottey Rice 4/23/2003 FOIA Request	Robert P. Richardson	Ronald Motley	S S	Š	71 KB	Attorney Work Product
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	Doc Type:	Doc Date:	Title Ref./Description:	- Author Name:	Recipients:	String:	Attachments:	File Size:	Privilege/Protection:
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			Arab Bank internal document produced in Linde, et	-					Order dated August 1, 2005, in
•			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
193	Wire Transfer	4/24/2003	4/24/2003 ABPLC191113			8 N	Š	61 KB	and related cases.
			Office of Information Resources Management						
,		4 10 1 10 0 0 0	Programs and Services response to Motiey Rice	. :	:	;	;	!	
194	relier	4/25/2003	4/25/2003 FUIA Request	Kene Lindsey	Konald Motley	No No	Yes	151 KB	Attorney Work Product
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
195	Wire Transfer	4/29/2003	4/29/2003 ABPLC196292			2	8 8	46 KB	and related cases.
			Defense Intelligence Agency response to Motley Rice	-					
196	Letter	4/29/2003	4/29/2003 FOIA Request	Robert P. Richardson	Ronald Motley	°Z	Š	25 KB	Attorney Work Product
			Office of Information Resources Management						
			Programs and Services response to Motley Rice						
197	Letter	4/30/2003	4/30/2003 FOIA Request	Richard C. Devine	Ronald Motley	8 N	Yes	594 KB	Attorney Work Product
198	Letter	4/30/2003	4/30/2003 FBI response to Motley Rice FOIA Request	David Hardy	Ronald Motley	2	Ves	1 439 KB	Attorney Work Product
				6	600000000000000000000000000000000000000		20/	2	Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al v. Arab Bank, PLC, Case No. 04-CV-						linde at al v Arah Rank DIC
			2799(NG)(VVP) and related cases with hates number						Case No. 04 CV 2709/NC)/A/B)
100	Wire Transfer	5/5/2003	Erona ABBI Classos			1	4	1	Case 140. 04-CV-Z/33(14G)(VVP)
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*****			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
200	Wire Transfer	5/7/2003	5/7/2003 ABPLC196294			S _o	2	67 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
201	Wire Transfer	5/12/2003	5/12/2003 ABPLC196295			N _o	8	46 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
;			2799(NG)(VVP) and related cases with bates number		,				Case No. 04-CV-2799(NG)(VVP)
202	Wire Iransfer	5/14/2003	5/14/2003 ABPLC196296			2	No No	46 KB	and related cases.
203	Letter	5/16/2003	Executive Office for United States Attorneys 5/16/2003 response to Motley Rice FOIA Request	Marie O'Rourke	Ronald Motley	2	o _Z	50 KB	Afforney Work Product
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			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
204	Wire Transfer		5/20/2003 ABPLC196297			Š	No	67 KB	and related cases.
	:		Justice Management Division response to Motley						
205	Letter	5/23/2003	5/23/2003 Rice FOIA Request	Benjamin F. Burrell	Ronald Motley	No	Yes	76 KB	Attorney Work Product
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
206	Wire Transfer		5/27/2003 ABPLC196298			Š	N _o	46 KB	and related cases.
			The state of the s						Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
207	Wire Transfer		5/28/2003 ABPLC196299			N _o	No No	47 KB	and related cases.
			Office of Information Resources Management						i.
			Programs and Services response to Motley Rice						
208	Facsimile	6/4/2003	6/4/2003 FOIA Request	Karen Brothers	Ronald Motley	^o Z	Yes	121 KB	Attorney Work Product
			Dept of Treasury, Disclosure Services response to						
509	Letter	6/9/2003	6/9/2003 Motley Rice FOIA Request	Alana Johnson	Ronald Motley	8	No.	30 KB	Attorney Work Product
			Justice Management Division response to Motley						
210	Letter	6/11/2003		Stephen K. Myers	Ronald Motley	Š	Yes	87 KB	Attorney Work Product
			US Customs Service response to Motley Rice FOIA						
211	Letter	6/13/2003	6/13/2003 Request	Gloria L. Marshall	Ronald Motley	No	No	45 KB	Attorney Work Product
******					Karen Brothers, U.S.				
					Department of State,				
			Motley Rice FOIA request to Office of Information		Office of IRM Programs				
212	Letter	6/19/2003	6/19/2003 Resources Management Programs and Services	Anne McGinness Kearse	and Services	No	Yes	65 KB	Attorney Work Product
			Department of Commerce response to Motley Rice						
213	Letter	6/23/2003	6/23/2003 FOIA Request	Brenda Dolan	Ronald Motley	^o Z	No	110 KB	Attorney Work Product
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215	Letter	6/30/2003	6/30/2003 Motley Rice FOIA request to IRS	Anne McGinness Kearse	Internal Revenue	٥ ۷	ON.	70 KB	Attorney Work Product
	:		Dept of Treasury, Disclosure Services response to		;			!	
91.7	Letter	(19/2003	//s/zou3 Motiey Rice FUIA Request	Alana Johnson	Anne McGinness Kearse No	92	No	2/ KB	Attorney Work Product
			Dept of Treasury response to Motley Rice FOIA	·	:				
717	Letter	(/9/2003	//9/2003 Kequest	Alana Johnson	Ronald Motiey	No No	No	22 KB	Attorney Work Product
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03-MDL-1570 Plaintiffs' Executive Committees' Privilege Log

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			Attachment to email correspondence with U.S.	J. Scott Tarbutton, Cozen	National Security				
220	Attachment	7/30/2003	7/30/2003 National Security Agency regarding FOIA request.	O'Connor.	Agency, FOIA Office.	Š	2	470 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Alana Johnson,				
221	Letter	7/30/2003	7/30/2003 Treasury regarding FOIA request.	O'Connor.	Department of Treasury. No	8 N	<u>%</u>	557 KB	Attorney Work Product
			Letter correspondence with U.S. National Security	J. Scott Tarbutton, Cozen	National Security				and the second s
222	Letter	7/30/2003	7/30/2003 Agency regarding FOIA request.	O'Connor.	Agency, FOIA Office.	⁸	S _N	470 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Department of Justice,				
223	Letter	7/30/2003	7/30/2003 Justice regarding FOIA request.	O'Connor.	FOIA Office.	2	N _o	367 KB	Attorney Work Product
					Dorothy Chambers,				
			Letter correspondence with U.S. Bureau of Alcohol,	J. Scott Tarbutton, Cozen	Bureau of Alcohol,				
224	Letter	7/30/2003	7/30/2003 Tobacco and Firearms regarding FOIA request.	O'Connor.	Tobacco and Firearms.	٧	8 8	442 KB	Attorney Work Product
			Letter correspondence with U.S. National Security	 Scott Tarbutton, Cozen 	National Security				
225	Letter	7/30/2003	7/30/2003 Agency regarding FOIA request.	O'Connor.	Agency, FOIA Office.	ջ	No	365 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	rbutton, Cozen	Alana Johnson,				
226	Letter	7/30/2003	7/30/2003 Treasury regarding FOIA request.	O'Connor.	Department of Treasury. No	ջ	S _S	447 KB	Attorney Work Product
			Letter correspondence with U.S. Defense Intelligence J. Scott Tarbutton, Cozen	 Scott Tarbutton, Cozen 	Defense Intelligence				
227	Letter	7/30/2003	7/30/2003 Agency regarding FOIA request.	O'Connor.	Agency, FOIA Office.	2	N _o	345 KB	Attorney Work Product
					Freedom Of Information				i companyanta
					Section, Executive Office				
					of United States				
				Andrew Maloney, Kreindler Attorneys, U.S.	Attorneys, U.S.				
228	Letter	7/30/2003	7/30/2003 FOIA Request	& Kreindler	Department of Justice	2	2	941 KB	Attorney Work Product
			Dept of Justice, Criminal Division response to Motley						
229	Letter	8/4/2003	8/4/2003 Rice FOIA Request	Thomas J. McIntyre	Ronald Motley	2 S	N _o	53 KB	Attorney Work Product
			Criminal Division response to Motley Rice FOIA						
230	Letter	8/8/2003 Request	Request	Thomas J. McIntyre	Ronald Motley	_S	S _O	33 KB	Attorney Work Product
				Robert P. Richardson,					
	;		Defense Intel	ligence Defense Intelligence	J. Scott Tarbutton,				
733	Letter	8/11/2003	8/11/2003/Agency regarding FOIA request.	Agency.	Cozen O'Connor.	2	Se Se	45 KB	Attorney Work Product
232	Letter	8/12/2003	8/12/2003 IRS response to Motley Rice FOIA Request	Symeria R. Rascoe	Anne McGinness Kearse No	<u>8</u>	o _Z	43 KB	Attornev Work Product
			Letter correspondence with U.S. Department of	David M. Hardy,	J. Scott Tarbutton,				
233	Letter	8/13/2003	8/13/2003 Justice regarding FOIA request.	Department of Justice.	Cozen O'Connor.	2	8	42 KB	Attorney Work Product
				Melissa Blevins, Bureau of					
			Letter correspondence with U.S. Bureau of Alcohol,	Alcohol, Tobacco and	J. Scott Tarbutton,				
234	Letter	8/13/2003	8/13/2003 Tobacco and Firearms regarding FOIA request.		Cozen O'Connor.	No.	No	57 KB	Attorney Work Product
į	:		Letter correspondence with U.S. Defense Security	Defense	J. Scott Tarbutton,				
235	Letter	8/14/2003		Security Office.	Cozen O'Connor.	No No	No No	381 KB	Attorney Work Product
236	Letter	8/26/2003	Letter correspondence with U.S. Department of 8/26/2003 Treasury regarding FOIA request.	Alana Johnson, Department of Treasury.	J. Scott Tarbutton, Cozen O'Connor.	Š	Ç.	79 KB	Affornev Work Product

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			of a Arab Bank of Casa No 04 CV		i di de i	_			Viede dated August 1, 2003, III
			al. v. Alab Dalik, P.L.C., Case No. 04-CV-		special Investigation				Linde, et al. V. Arab Bank, PLC,
		-	') and related cases with bates number		Committee, Banque du				Case No. 04-CV-2799(NG)(VVP)
237	Letter	9/8/2003		Muhammad al-Baasirii		_S	2	31 KB	and related cases.
			Letter correspondence with U.S. Department of	Stephen K. Myers,	 Scott Tarbutton, 				
238	Letter	9/16/2003		Department of Justice.	Cozen O'Connor.	Ŷ.	Š	146 KB	Attorney Work Product
			Department of		J. Scott Tarbutton.				
239	Letter	9/26/2003		Department of Justice.	Cozen O'Connor.	Š	2	19 KB	Attornev Work Product
			. Defense Security	ě	J. Scott Tarbutton.				
240	Letter	10/8/2003				8	2	88 KB	Attorney Work Product
241	Letter	10/8/2003	10/8/2003 IRS response to Motley Rice FOIA Request	Symeria R. Rascoe	Anne McGinness Kearse No	No	No	73 KB	Attorney Work Product
242	Letter	10/8/2003	10/8/2003 IRS response to Motley Rice FOIA Request	Symeria R. Rascoe	Anne McGinness Kearse No	Š	CZ	26 KB	Attorney Work Product
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			Email correspondence with U.S. Department of	peland	Scott Tarbutton				
243	Fmail	10/9/2003	5			ON CHARLES	2	07.70	Attorney Mork Broduct
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244	letter	10/9/2003	10/9/2003 IRS response to Motley Rice FOIA Regiset	Symposia R. Rascoo	N.C. oncox security M.C.	2	2	an ac	Attorney Work Broduct
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245	Letter	10/16/2003	10/16/2003 FOIA request.	O'Connor.		No O	No	49 KB	Attorney Work Product
					Dorothy Chambers,				
			<u>6</u>	rbutton, Cozen					
246	Letter	10/17/2003	st.		_	S _O	2	36 KB	Attorney Work Product
				rbutton, Cozen	Department of Treasury,				
247	Letter	10/17/2003	10/17/2003 Treasury regarding FOIA request.		FOIA Office.	_S	2	32 KB	Attorney Work Product
			Defense Intelligence		Defense Intelligence				
248	Letter	10/17/2003		O'Connor.	Agency, FOIA Office.	°Z	₈	34 KB	Attorney Work Product
			Office of Information Resources Management						
			Services response to Motley Rice						*****
249	Letter	10/17/2003		Margaret P. Grafeld	Ronald Motley	°Z	Yes	13,976 KB	13,976 KB Attorney Work Product
			Dept of Treasury response to Motley Rice FOIA						
250	Letter	10/24/2003 Request			Anne McGinness Kearse No		No	21 KB	Attorney Work Product
			Department of		J. Scott Tarbutton,				
251	Email	10/27/2003		reasury.		No No	No	25 KB	Attorney Work Product
			Department of		J. Scott Tarbutton,				
252	Letter	10/29/2003		Department of Justice.	Cozen O'Connor.	S.	No	62 KB	Attorney Work Product
253	leffer	10/29/2003	Dept of Treasury, Disclosure Services response to 10/29/2003 Motley Rice FOIA Reguest	Alaba Johnson	Anne McGinness Kearse No		O.	23 KB	Afforney Mork Product
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					Patricia Warden, Bureau					
254	Letter	10/31/2003	Motley Rice FOIA request to the Bureau of Engraving 10/31/2003 and Printing	Ronald Motlev		Ŷ	2	771 KB	Attorney Work Product	
					FOIA/PA Mail Referral					-
			Motley Rice FOIA request to Dept of Justice, Justice		Unit, Justice					
			Management		Management Division,					
255	Letter	10/31/2003 Division	Division	Ronald Motley	ë	No	No	79 KB	Attorney Work Product	
					Margaret P. Grafeld,					
			Motley Rice FOIA reginest to Office of Information		Information and Privacy					
256	Letter	10/31/2003		Ronald Motlev		2	<u>%</u>	771 KB	Attornev Work Product	
					Chambers, U.S.					
					Department of the					
					Treasury, Alcohol and					
			Mottey Rice FOIA request to Dept of Treasury		Tobacco Tax and Trade					
257	Letter	10/31/2003		Ronald Motley		2	No No	769 KB	Attorney Work Product	
					Frank Vance,					_
					Comptroller of the					
			Motiev Rice FOIA request to Comptroller of the		Currency Disclosure				•	
258	letter	10/31/2003 Currency		Ronald Motley		2	S.	769 KB	Attorney Work Product	
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			Motley Rice FOIA request to Dept of Treasury		Department of the					
259	Letter	10/31/2003		Ronald Motley		S	2	771 KB	Attorney Work Product	
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			Motley Rice FOIA reguest to Inspector General for		Inspector General for					
261	l etter	10/31/2003		Ronald Motley		Š	S	771 KB	Attorney Work Product	
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					Department of the					
			Motley Rice FOIA reguest to Dent of Treasury		Treasury Bureau of the					
262	letter	10/31/2003	<u>.</u>	Ronald Motley		S	2	773 KB	Afformey Work Product	
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263	letter	10/31/2003		Ronald Motley		Š	N _O	777 KB	Attorney Work Product	
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03-MDL-1570 Plaintiffs' Executive Committees' Privilege Log

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					Gregory Smith, U.S.				
					Department of the				
					Treasury, Financial				
		-	Motley Rice FOIA request to Financial Crimes		Crimes Enforcement				
264	Letter	10/31/2003	10/31/2003 Enforcement Network (FinCEN)	Ronald Motley	Network (FinCen)	^o Z	N _o	771 KB	Attorney Work Product
					Patricia Warden Bureau				
			Mottey Rice FOIA request to Bureau of Engraving		of Engraving and				
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207	reller	10/31/2003	and Fringing	Ronald L. Mottey	Printing	2	0	9	Attorney work Product
					Margaret Grareid,				
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					Coordinator, Office of				
*****			Motley Rice FOIA request to Dept of State, Office of		Information Resources				
			Information Resources Management Programs and		Management Programs				
266	Leffer	10/31/2003 Services	Services	Ronald I Moffey	and Services	2	2	771 KB	Afforney Work Product
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			Motley Rice FOIA request to Dept of Treasury,		Management Service,				1
267	Letter	10/31/2003	10/31/2003 Financial Management Services	Ronald L. Motley	Disclosure Branch	2	2	777 KB	Attorney Work Product
					Melissa Stuart, US				
					Department of the				
					Transport Office of the				
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			Motiey Rice FOIA request to inspector General for		Inspector General for				
268	Letter	10/31/2003	10/31/2003 the Tax Administration	Ronald L. Motley	Tax Administration	2	9	771 KB	Attorney Work Product
					Gregory Smith, US				
			Mottey Rice FOIA request to Dept of Treasury,		Department of the				
269	Letter	10/31/2003 FinCEN	FinCEN	Ronald L. Motley	Treasury (FinCEN)	2	2	771 KB	Attorney Work Product
					Dorothy Chambers, US				
					Department of the				
		_			Treasury Alcohol and				
			Mottey Rice FOIA request to Dent of Treasury		Tohacco Tax and Trade				
270	Leffer	10/31/2003	10/31/2003 Alcohol and Tobacco Tax and Trade Bureau	Ronald I Moffey	Bureau	2	ç	769 KB	Attorney Work Product
				6	Frank Vance.				
		_			Comptroller of the				
			Motley Rice FOIA request to Comptroller of the		Currency Disclosure				
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1/7	Letter	10/31/2003 Currency	Currency	Konald L. Motley	(FUIA) Uffice	ou u	ou U	/69 KB	Attorney Work Product
					DIR Koberts, US				
		_	-		Department of the				
			Motley Rice FOIA request to Dept of Treasury, Office		Treasury, Office of Thrift				
272	Letter	10/31/2003	10/31/2003 of Third Supervision	Ronald L. Motley	Supervision	no ou	00	777 KB	Attorney Work Product
			ne Public Debt response						
273	Letter *	11/6/2003		Denise K. Hofmann	Ronald Motley	Š	No O	25 KB	Attorney Work Product

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	16	+	Office of Information Resources Management						
			Programs and Services response to Motley Rice						
274	Letter	11/12/2003	11/12/2003 FOIA Request	Rene Lindsey	Ronald Motley	2	Ŷ.	200 KB	Attorney Work Product
			Dept of Treasury, Financial Management Servcies	•	•				
275	Letter	11/17/2003	11/17/2003 response to Motley Rice FOIA Request	Tom Longnecker	Ronald Motley	õ	Š	26 KB	Attorney Work Product
				Daniel Marcus, National					
			Letter correspondence with National Commission on	Commission on Terrorist					
			Terrorist Attacks Upon the United States regarding	Attacks Upon the United	J. Scott Tarbutton,				
276	Letter	11/18/2003	11/18/2003 FOIA request.	States.	Cozen O'Connor.	Š	S _o	36 KB	Attorney Work Product
			Bureau of Engraving and Printing response to Motley						
277	Letter	11/18/2003	11/18/2003 Rice FOIA Request	Patricia Warden	Ronald Motley	Š	N _o	30 KB	Attorney Work Product
			Dept of Treasury, Disclosure Services response to						
278	Letter	11/18/2003	11/18/2003 Motley Rice FOIA Request	Alana Johnson	Ronald Motley	S _N	No No	30 KB	Attorney Work Product
			Dept of Treasury, Disclosure Services response to						
279	Letter	11/18/2003	11/18/2003 Motley Rice FOIA Request	Alana Johnson	Ronald Motley	S _o	Š	28 KB	Attorney Work Product
									Produced pursuant to Protective
			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al v. Arab Bank, PLC, Case No. 04-CV-						linde et al v Arah Bank PIC
			2799(NG)/VVP) and related cases with bates number						Case No 04-CV-2799(NG)(V/P)
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1.97	Letter	11/21/2003	11/Z1/Z003 FOIA Request	Gregory A. Smith	Ronald Motley	2	Yes	292 KB	Attorney Work Product
			Dept of Treasury, Disclosure Services Office						
282	Letter	11/25/2003	11/25/2003 response to Motley Rice FOIA Request	Melissa D. Stuart	Ronald Motiey	No	Yes	96 KB	Attorney Work Product
					FBI, Attn: Freedom of				
					Information-Privacy Act				
					Unit, Records Resources				
283	Letter	11/25/2003	11/25/2003 Mottey Rice FOIA request to FBI	Michael E. Elsner	Division	5	2	114 KB	Attorney Work Product
					Margaret P. Grafeld,				
****					Information and Privacy				
			Motley Rice FOIA request to Office of Information		Coordinator, Department				
284	Letter	12/3/2003	12/3/2003 Resources Management Programs and Services	Michael Elsner	of State	No	No	29 KB	Attorney Work Product
					Alana Johnson,				,
			Motley Rice FOIA request to US Dept of Treasury,		Department of the				
285	Letter	12/3/2003	12/3/2003 Departmental Offices	Michael Elsner	Treasury	S N	S _o	29 KB	Attorney Work Product
					Alana Johnson, FOIA				
					Request Department of				
286	Letter	12/3/2003	12/3/2003 FAA response to Motley Rice FOIA Request	Michael E. Elsner	Treasury	no	no	44 KB	Attorney Work Product
					David Hardy, Chief FOIA				
					Section FBI, Department				
287	Letter	12/3/2003	12/3/2003 Motley Rice FOIA request to FBI	Michael E. Elsner	of Justice	2	00	29 KB	Attorney Work Product
-			Motley Rice FOIA request to Central Intelligence	i !	Information and Privacy				
288	Letter	12/3/2003 Agency	Agency	Michael E. Elsner	Coordinator, CIA	no	no	29 KB	Attorney Work Product
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305	Letter	Motley R 2/17/2004 Division	Motley Rice FOIA request to Justice Management Division	Michael Fisner	Unit, Justice Management Division,	2	S	2	4. L - C L - C L - W.
				MICHACI LISHO	Department of Justice	2	NO	114 KB	Attorney Work Product
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202		7 0001	Motley Rice FUIA request to Dept of Justice		Management Division				
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			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
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308	Statement	2/29/2004	2/29/2004 ABPLC008888			å	_S	36 KB	and related cases.
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	Y		al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
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303	Statement	2/29/2004	2/29/2004 ABPLC008066			ջ	No	34 KB	and related cases.
									Produced pursuant to Protective
			Arab Bank Internal document produced in Linde, et						Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC
			2799(NG)(VVP) and related cases with bates number						Case No. 04-CV-2799(NG)(VVP)
310	Wire I ransfer	3/1/2004	3/1/2004 ABPLC195816			S.	N _o	63 KB	and related cases.
-				Marie A. O'Rourke,					
				Executive Office US					
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	-			Information Unit,	Andrew Maloney,			••	
2 2	Letter	3/18/2004		Department of Justice	Kreindler & Kreindler	2	yes	566 KB	Attorney Work Product
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312	Letter	3/19/2004		Department of Justice.	Cozen O'Connor.	ě	2	58 KB	Afforney Work Product
,			Dept of Justice, Criminal Division response to Motley						in the second se
313	Letter	3/26/2004	3/26/2004 Rice FOIA Request	Thomas J. McIntyre	Ronald Motley	õ	§.	33 KB	Attorney Work Product
					Marie A. O'Rourke,				
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314	Letter	3/29/2004	3/29/2004 FOIA Request	Andrew Maloney, Kreindler Information Unit, & Kreindler	Information Unit, Department of Tretice		90%	77 70	A 44
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Intelligence Agency Margaret P. Grafeld

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4/14/2004 Motley Rice FOIA request to CIA

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Michael E. Elsner

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Motley Rice FOIA request to Office of Information

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Motley Rice FOIA request to National Security

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4/27/2004 Council

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			Federal Aviation			
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	Motley Rice FOIA request to Office of General		Executive Office of			

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Immigration Review

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4/5/2004 Council

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Eileen Donovan FOIA Matters,

Assistant Secretary for

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Motley Rice FOIA request to Commodity Futures 4/12/2004 Trading Commission

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Eileen Donovan,

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327	letter	5/6/2004	5/6/2004 Motley Rice FOIA request to FBI	Michael E. Elsner	Department of Justice	ou Ou	ou	22 KB	Attorney Work Product
328	Letter	5/13/2004	5/13/2004 CIA response to Motley Rice FOIA Request	Alan W. Tate	Michael Elsner	No	Yes	562 KB	Attorney Work Product
			Office of Information Programs response to Motley						
329	Letter	5/13/2004	5/13/2004 Rice FOIA Request	Jerry Allsbrook, Jr.	Michael Elsner	No No	S _N	73 KB	Attorney Work Product
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330	Letter	5/13/2004	5/13/2004 Resources Management Programs and Services	Michael Elsner	of State	No	No	22 KB	Attorney Work Product
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331	Letter	5/13/2004		Michael Elsner	Act Staff	No	No	22 KB	Attorney Work Product
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332	Letter	5/27/2004	5/27/2004 Justice regarding FOIA request.	O'Connor.	Department of Justice.	8 8	No.	25 KB	Attorney Work Product
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333	Letter	5/27/2004	5/27/2004 Homeland Security regarding FOIA request.	O'Connor.	Security.	No No	No	114 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Melissa Blevins,				
334	Letter	5/27/2004	5/27/2004 Justice regarding FOIA request.	O'Connor.	Department of Justice.	No No	2	167 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	J. Scott Tarbutton. Cozen	Alana Johnson.				
335	Letter	5/27/2004		O'Connor.	Department of Treasury.	Š	9	116 KB	Attorney Work Product
					Robert P. Richardson,				
			Letter correspondence with U.S. Defense Intelligence	elligence J. Scott Tarbutton. Cozen	Defense Intelligence				
336	Letter	5/27/2004	5/27/2004 Agency regarding FOIA request.	O'Connor.	Agency.	Š	No.	142 KB	Attorney Work Product
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			Arab Bank internal document produced in Linde, et						Order dated August 1, 2005, in
			al v Arab Bank PLC Case No 04-CV-						Linde et al. v. Arab Bank. PLC.
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338	Letter	6/2/2004		Michael Elsner	Jimmy Carter Library	S S	No No	22 KB	Attorney Work Product
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	355	Letter *	6/26/2004	FAA response to Motley Rice FOIA Request	Joann Noonan	Michael Elsner		No	40 KB	Attorney Work Product	\neg

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					David M. Hardy, Chief				
					FOIA Section, FBI				
372	Letter	8/10/2004	8/10/2004 Motley Rice FOIA request to FBI	Michael E. Elsner	Department of Justice	2	o	22 KB	Attorney Work Product
					Margaret P. Grafeld,				
					Office of Information				
					Programs and Services,				
				John Fawcett, Kreindler &	U.S. Department of				
373	Letter	8/12/2004	8/12/2004 FOIA Request	Kreindler	State,	2	2	26 KB	Attorney Work Product
374	Letter	8/13/2004	8/13/2004 FAA response to Motley Rice FOIA Request	Joann Noonan	Michael Elsner	2	ou	27 KB	Attorney Work Product
375	Letter	8/13/2004	8/13/2004 FAA response to Motley Rice FOIA Request	Joann Noonan	Michael Elsner	2	2	30 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Department of Justice,				
376	Letter	8/20/2004	8/20/2004 Justice regarding FOIA request.	O'Connor.	FOIA Office.	ž	No	234 KB	Attorney Work Product
					Margaret P. Grafeld,	-			
					Office of Information				
					Programs and Services,				
				John Fawcett, Kreindler &	U.S. Department of				
377	fax	8/24/2004	8/24/2004 Correspondence Re FOIA Request 200403264	Kreindler	State,	2	yes	2134 KB	Attorney Work Product
			Criminal Division response to Motley Rice FOIA						
378	Letter	8/27/2004 Request	Request	Thomas J. McIntyre	Michael Elsner	S	S _o	41 KB	Attorney Work Product
			Transfering Parking 14	Margaret P. Grafeld, Office					
				of Information Programs			-		
				and Services, U.S.	John Fawcett, Kreindler				
379	Letter	8/27/2004	8/27/2004 Correspondence Re FOIA Request 200403264	Department of State	& Kreindler	2	2	57 KB	Attorney Work Product
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					Administration, National				
					Freedom of Information				
380	Letter	8/28/2004	8/28/2004 Motley Rice FOIA request to FAA	Michael E. Elsner	Act Staff	2	ou	22 KB	Attorney Work Product
			Dept of Treasury response to Motley Rice FOIA						
381	Letter	8/30/2004 Request	Request	Merete M. Evans	Ronald Motley	<u>گ</u>	S _o	25 KB	Attorney Work Product
			President George H.W. Bush Library response to		Warren Finch, President				- Paragraphia de la composição de la com
			Motley Rice FOIA		George H.W. Bush				
382	Letter	9/1/2004 Request	Request	Michael Elsner	Library	Š	8	504 KB	Attorney Work Product
			FAA SW Region response to Motley Rice FOIA					,	
383	Letter	9/8/2004 Request	Request	Ava Wilkerson	Michael Elsner	01	yes	4,071 KB	Attorney Work Product
384	Letter	9/8/2004	9/8/2004 FAA response to Motley Rice FOIA Request	Ava Wilkerson	Michael Elsner	2	yes	4,080 KB	Attorney Work Product
					Associate Administrator				
					for Regions and Center				
					Operation, ARC-1,				
	;			; ;	Federal Aviation				
280	Letter	9/11/2004	9/11/2004 Motley Rice FOIA request to FAA	Michael E. Elsner	Administration	20	U0	545 KB	Attorney Work Product

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					Sarah Normand,				
					Executive Office US				
				Andrew Maloney, Kreindler Attorneys, U.S.	Attorneys, U.S.				
386	Letter	9/13/2004	9/13/2004 Re: MDL 1570	& Kreindler	Department of Justice	on O	yes	112 KB	Attorney Work Product
387	Letter	9/14/2004	9/14/2004 FAA response to Motley Rice FOIA Request	Tracy Paquin	Michael Elsner	no	no	24 KB	Attorney Work Product
					David M. Hardy, Chief				
	:				FOIA Section, FBI	-			
388	Letter	9/22/2004	9/22/2004 Motley Rice FOIA request to FBI	Mary Schiavo	Department of Justice	no	no	27 KB	Attorney Work Product
389	Letter	9/22/2004	9/22/2004 Motley Rice FOIA request to FBI	Mary Schiavo	FBI Laboratory	no	no	27 KB	Attorney Work Product
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390	etter	9/24/2004	9/24/2004 Readen I ihrary	Michael E	Readan Library	2	ç	25 KB	Attorney Work Product
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391	Letter	9/27/2004	9/27/2004 Justice regarding FOIA request.	Department of Justice.	Cozen O'Connor.	2	N _o	53 KB	Attorney Work Product
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					Chief, Freedom of				
					Information Operations				
					Unit, Drug Enforcement				
392	Letter	9/30/2004	9/30/2004 Motley Rice FOIA request to DEA	Michael Elsner	Administration	£	No	21 KB	Attorney Work Product
					David M. Hardy, Chief				
					FOIA Section, FBI				
393	Letter	9/30/2004	9/30/2004 Motley Rice FOIA request to FBI	Michael E. Elsner	Department of Justice	2	00	22 KB	Attorney Work Product
			Office of Information Resources Management						
			Programs and Services response to Motley Rice						
394	Letter	10/5/2004	10/5/2004 FOIA Request	Margaret P. Grafeld	Ronald Motley	2	Yes	494 KB	Attorney Work Product
395	Letter	10/29/2004	10/29/2004 TSA response to Motley Rice FOIA Request		Michael Elsner	Se Se	Yes	555 KB	Attorney Work Product
				rcett, Kreindler &	FOIA Office, U.S.				
396	Letter	11/5/2004	11/5/2004 FOIA Request	Kreindler	Department of Justice	no	no	25 KB	Attorney Work Product
			President Ronald Reagan Library response to Motley						
397	Letter	11/8/2004	11/8/2004 Rice FOIA Request	Shelly Jacobs	Michael Elsner	no	no	90 KB	Attorney Work Product
					Karen Brothers, U.S.				
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399	Letter	11/24/2004	11/24/2004 Motley Rice FOIA Request	Margaret P. Grafeld	Ronald Motley	2	Yes	2.585 KB	Attornev Work Product
400	Letter	12/28/2004	12/28/2004 FBI response to Motley Rice FOIA Request	David Hardv	Michael Elsner	02	ves	99 KB	Afforney Work Product
			Dept of the Navy response to Motley Rice FOIA						
401	Letter	1/5/2005 Request	Request		Ronald Motley	2	yes	510 KB	Attorney Work Product
2		111710005	Letter correspondence with U.S. Department of	arbutton, Cozen	Alana Johnson,			77.	A Moderate Date de la constante d
402	Letter «	G002// L/I	1/1 //Zuub Ireasury regarding FUIA request.	O Connor.	Department of Treasury.	No.	NO	2317 KB	Attorney work Product

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403	Letter	1/25/2005	1/25/2005 Treasury regarding FOIA request.	Department of Treasury.	Cozen O'Connor.	8 2	°Z	78 KB	Attorney Work Product
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404	reliei	CUUZ/UT/Z	Z/10/Z005 Programs and Services	Michael Elsner	and services	2	ON	34 KB	Attorney work Product
			Re: In re Terrorist Attacks Litigation of Septemebr 11,		Andrew Maloney,				
405	Letter	2/10/2005 2001	2001	York	Kreindler & Kreindler	입	no	31 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Alana Johnson,				
406	Letter	2/16/2005	2/16/2005 Treasury regarding FOIA request.	O'Connor.	Department of Treasury.	٩	No	1024 KB	Attorney Work Product
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			Arab Bank internal document produced in Linde, et			-			Order dated August 1, 2005, in
			al. v. Arab Bank, PLC, Case No. 04-CV-						Linde, et al. v. Arab Bank, PLC,
			2799(NG)(WP) and related cases with bates number		***************************************				Case No. 04-CV-2799(NG)(VVP)
407	List	3/27/2005	3/27/2005 ABPLC002292 - ABPLC002326			8 8	8	2734 KB	and related cases.
			Office of Information Programs response to Motley						
408	Letter	5/10/2005	5/10/2005 Rice FOIA Request	Margaret P. Grafeld	Ronald Motley	Š	Yes	3,367 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Alana Johnson,				
409	Letter	5/16/2005	5/16/2005 Treasury regarding FOIA request.	O'Connor.	Department of Treasury.	Š	S _O	1067 KB	Attorney Work Product
				Marie A. O'Rourke,					
	-			Executive Office US					
				Attorneys, Freedom of					
				Information Unit,	Andrew Maloney,				
410	Letter	5/18/2005	5/18/2005 Correspondence re FOIA Request 03-2560	Department of Justice	Kreindler & Kreindler	no	yes	603 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Alana Johnson,				
411	Letter	5/23/2005	5/23/2005 Treasury regarding FOIA request.	O'Connor.	Department of Treasury.	8 2	N _o	871 KB	Attorney Work Product
			Dept of Treasury, Departmental Offices response to						
412	Letter	5/24/2005	5/24/2005 Motley Rice FOIA Request	Alana Johnson	Ronald Motley	2	No	20 KB	Attorney Work Product
					FOIA/PA Mail Referral				
					Unit, Justice		,		
			Motley Rice FOIA request to Justice Management		Management Division,				
413	Letter	5/25/2005 Division	Division	Benjamin Davis	Department of Justice	Š	No No	33 KB	Attorney Work Product
		1			Kathy Ray, Department				
4.4	retter	5/25/2005	5/25/2005 Motiey Rice FUIA request to Dept or Transportation	Benjamin Davis	of Iransportation	ON N	So	33 KB	Attorney Work Product
-					FOIA/PA Mail Referral				
			Motley Rice FOIA regilest to lightice Management		Management Division				
415	Letter	5/25/2005	5/25/2005 Division	Benjamin Davis	Department of Justice	2	2	33 KB	Attorney Work Product
416	Letter	6/22/2005	FAA response to Motley Rice FOIA Request	John Barrett	Michael Elsner	2	20	108 KB	Attorney Work Product
	9		mahr 11	United States Attorney	Andrew Majores				
417	Letter	7/5/2005 2001	in a colored reader of copies of the		Kreingler & Kreingler	٠ و	ou.	93 KB	Attorney Work Product
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Author Name			Pichord Link		Miller	Scott Koch			Margaret P. Grafeld			Margaret P. Grafeld, Office	Irams	and Services, U.S.	ø.		1		Michael Elsner	David M. Hardy		on. Cozen			Ronald Deacon		Alana Johnson		Margaret Bestrain		Priscilla Jones	<u> </u>			Michael Elsner	1 .			rbutton, Cozen		
Title Ref (Description:	EBI response to Motion Dice FOIA Demost		Uept of Justice Office of Information and Privacy				US Dept of State, Office of Information Resources	Management Programs and Services response to		Dept of Treasury, FinCEN response to Motley Rice	9/30/2005 FOIA Request				11/17/2005 Correspondence Re FOIA Request 200403264				11/22/2005 Motley Rice FOIA request to Dept of Transportation			elligence	,	ment Division	12/5/2005 response to Motley Rice FOIA Request	Dept of Treasury Disclosure Services response to	12/16/2005 Motley Rice FOIA Request	Defense Intelligence Agency response to Motley Rice		Dept of Justice Office of Information and Privacy	2/7/2006 response to Motley Rice FOIA Request		3 1 3 2 3 3 4 3 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	ist to Utilice of Information	2/13/2006 Programs and Services		quest to Dept of Treasury,		epartment of		
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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
	:		Defense Intelligence	J. Scott Tarbutton, Cozen	Brian S. Kinsey, Defense				
437	Letter	2/17/2006	2/17/2006 Agency regarding FOIA request.	O'Connor.	Intelligence Agency.	No No	S _o	168 KB	Attorney Work Product
438	Letter	3/22/2006	Letter correspondence with U.S. Defense Intelligence Is A22/2006 Agency regarding FOIA request	Margaret A. Bestrain, Defense Intelligence Agency	J. Scott Tarbutton, Cozen O'Connor	Ç Z	Ç	33 KB	Attorney Work Product
439	Letter	4/6/2006	ce of Information	Margaret P. Grafeld	Michael Elsner	2 2	Yes	2 618 KB	Attorney Work Product
			e e	Margaret A. Bestrain, Defense Intelligence	J. Scott Tarbutton.				
440	Letter	4/12/2006	•	Agency.	Cozen O'Connor.	ş	No	55 KB	Attorney Work Product
441	Letter	4/20/2006	lotley	Margaret P. Grafeld	Michael Elsner	S S	Yes	2,909 KB	Attorney Work Product
442	Letter	5/10/2006	FinCEN Disclosure Offices response to Motley Rice 6/10/2006 FOIA Request	Gregory A. Smith	Michael Elsner	No	No	44 KB	Attorney Work Product
443	Letter	5/11/2006	5/11/2006 USAID response to Motley Rice FOIA Request	Carolyn a. Carroll	Anne McGinness Kearse no	00	yes	89 KB	Attorney Work Product
					Law Enforcement,				1
			Motley Rice FOIA request to Dept of Treasury,		Department of the Treasury, Disclosure				
444	Letter	5/23/2006		Michael Elsner	Services	No	Yes	242 KB	Attorney Work Product
445	Letter	5/26/2006	' Rice	Margaret McCloskey Shanks	Michael Elsner	no	yes	96 KB	Attorney Work Product
446	Letter	6/2/2006		Dale Underwood	Anne McGinness Kearse No	No	Yes	103 KB	Attorney Work Product
447	Letter	6/2/2006		Dale Underwood	Ronald Motley	S S	Yes	176 KB	Attorney Work Product
448	Letter	6/2/2006	Dept of Treasury, Disclosure Services response to 6/2/2006 Motley Rice FOIA Request	Dale Underwood	Anne McGinness Kearse No	<u>8</u>	No No	34 KB	Attorney Work Product
449	Fax	6/5/2006		FAA Aircraft Registry	John Fawcett, Kreindler & Kreindler	00	00	416 KB	Attorney Work Product
450	Letter	6/8/2006	US Dept of Treasury, Disclosure Services response 6/8/2006 to Motley Rice FOIA Request	Hugh Gilmore	Michael Elsner	2	. Q	68 KB	Attorney Work Product
451	Letter	6/21/2006	response to Motley	Joe Morton	Michael Elsner	2	Yes	275 KB	Attorney Work Product
452	Letter	6/27/2006	Letter correspondence with U.S. Defense Intelligence of 6/27/2006 Agency regarding FOIA request.	telligence J. Scott Tarbutton, Cozen O'Connor.	Margaret A. Bestrain, Defense Intelligence Agency.	8	No.	198 KB	Attorney Work Product
			Dant of Traseino Dischaira Saniras rasonnes to		Dale Underwood, Department of the Treasury Disclosure				
453	Letter *	6/29/2006		Michael Elsner	Services	No	Yes		Attorney Work Product
454	Letter	7/19/2006	7/19/2006 TSA response to Motley Rice FOIA Request	Scott Koch	Michael Elsner	No	Yes	81 KB	Attorney Work Product
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	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				Alana Johnson,	6	$\overline{}$		
			Motley Rice FOIA request to Dept of Treasury		Department of the				
455	Letter	8/24/2006	8/24/2006 Disclosure Services	Michael Elsner	Treasury	S S	No	135 KB	Attorney Work Product
456	Letter	8/29/2006	8/29/2006 USAID response to Motley Rice FOIA Reguest	.I M Paskar	Anne McGinness Kearse no	2	Ç.	254 KB	Afformev Work Product
2		2007/07/0	11S Don't of State Office of Information December	5000	201000000000000000000000000000000000000	2	2		Toppol Work follows
			Nanagement Programs and Services response to						
457	Letter	9/1/2006	9/1/2006 Motley Rice FOIA Request	Charlene Wright Thomas	Michael Elsner	No	No	57 KB	Attorney Work Product
			Dept of Treasury Disclosure Services response to						
458	Letter	9/1/2006	9/1/2006 Motley Rice FOIA Request	Dale Underwood	Michael Elsner	No	No	54 KB	Attorney Work Product
					Keith Roberts, Chief				
459	Letter	9/25/2006	9/25/2006 Motley Rice FOIA request to the White House	Michael E. Elsner	House	2	ves	70 KB	Attornev Work Product
					Keith Roberts, Chief				
					FOIA Officer, White				
460	Letter	9/25/2006	9/25/2006 Motley Rice FOIA request to White House	Michael E. Elsner	House	2	yes	70 KB	Attorney Work Product
	;			John Fawcett, Kreindler &	U.S. Department of the				
461	Letter	9/26/2006	9/26/2006 FOIA Request	Kreindler	Ireasury FOIA Office	о С	2	22 KB	Attorney Work Product
462	Letter	9/27/2006	9/27/2006 FAA response to Motley Rice FOIA Request	Douglas Murphy	Michael Elsner	on O	01	132 KB	Attorney Work Product
					U.S. Department of				
					State, Office of				
-			Motley Rice FOIA request to Office of Information		Information Programs				
463	Letter	10/4/2006	10/4/2006 Resources Management Programs and Services	Michael Elsner	and Services	S N	_S	66 KB	Attorney Work Product
;			US Immigration and Customs Enforcement response	:	į				
464	Letter	10/16/2006	10/16/2006 to Motley Rice FOIA Request	Gloria Marshall	Michael Elsner	2	yes	132 KB	Attorney Work Product
				Hugh Gilmore, Disclosure		A.W.			
				Services, U.S. Department John Fawcett, Kreindler	John Fawcett, Kreindler				
465	Letter	10/16/2006	10/16/2006 Correspondence Re FOIA Request 2006-10-03	of the Treasury	& Kreindler	ဥ	ou	429 KB	Attorney Work Product
			Mofley Rice FOIA request to Dept of Homeland		Privacy Office, Department of Homeland				
466	Letter	11/20/2006 Security		Michael E. Elsner	Security	2	yes	339 KB	Attorney Work Product
			Dept of State, Office of Information Programs and						
467	Letter	12/5/2006	12/5/2006 Services response to Motley Rice FOIA Request	Erica Perel	Michael Elsner	2	2	94 KB	Attorney Work Product
888	offer	10/6/2006	Dept of Homeland Security, Office of the General	Trico Dorol	Michael Elener	C C	o d	ал 20	touload Jack Lomette
100	Louisi	12/3/2000	FinCEN Disclosure Offices response to Motley Disc	Linearelei	MICHAEL LISHE	2	2	7	Attorney Work Floadet
469	Letter	12/15/2006	2/15/2006 FOIA Request	Gregory A. Smith	Michael Elsner	^o N	°2	109 KB	Attorney Work Product
			Office of Information Programs and Services						
470	Letter	1/18/2007		Margaret P. Grafeld	Michael Elsner	No No	Yes	177 KB	Attorney Work Product
171	E B S S S S S S S S S S S S S S S S S S	1/05/2007	Email correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Department of Defense,	2	Yes (see ID #	3	Attomes Mork Broduct
Ť	Finali	1/20/2001	חפופוסם ופאמותיים היום ופאחמים	O Collinat.	TOIN CHIESE.	2	412)	- 170	Audiney work I loader

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	coc 13 bc.	DOC Date.	Attachment to email correspondence with 11 S	0	Department of Defence	Silling:	Attacriments: rife Size.	rile Size.	Privilege/Protection:
472	Attachment	1/25/2007	1/25/2007 Department of Defense regarding FOIA request.	O'Connor.	FOIA Office.	2	<u>%</u>	103 KB	Attorney Work Product
	-	1000	Letter correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Department of Defense,				
8/4	Letter	1/25/2007	1/25/2007 Treasury regarding FOIA request.	O'Connor.	FOIA Office.	o N	No	103 KB	Attorney Work Product
474	Letter	1/31/2007	Office of Information Program and Services response 1/31/2007 to Motley Rice FOIA Request	Margaret P. Grafeld	Michael Elsner	No	Yes	508 KB	Attorney Work Product
			US Dept of State, Office of Information Programs and						
475	Letter	2/1/2007	2/1/2007 Services response to Motley Rice FOIA Request		Anne McGinness Kearse no	2	yes	596 KB	Attorney Work Product
	:		Email correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Department of Defense,		Yes (see ID #		
476	Email	3/15/2007	3/15/2007 Defense regarding FOIA request.	O'Connor.	FOIA Office.	2	477)	1 KB	Attorney Work Product
477	Attachment	3/15/2007	Attachment to email correspondence with U.S. 3/15/2007 Department of Defence regarding FOIA regulast	J. Scott Tarbutton, Cozen	Department of Defense,	<u> </u>	Ç	447 77	Attorno Mork Droding
		10070110	letter correctiondence with 11 S. Denestraent of	Scott Tarkutton Cozen	Department of Defence	2	2	2	Allowing work Floduce
478	Letter	3/15/2007	3/15/2007 Defense regarding FOIA request.	O'Connor.	FOIA Office,	_S	<u>8</u>	117 KB	Attorney Work Product
			Email correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Department of Defense.		Yes (see ID #		
479	Email	3/16/2007	3/16/2007 Defense regarding FOIA request.	O'Connor.	FOIA Office.	₈	480)	1 KB	Attorney Work Product
			Attachment to email correspondence with U.S.	J. Scott Tarbutton, Cozen	Department of Defense,				
480	Attachment	3/16/2007	3/16/2007 Department of Defense regarding FOIA request.	O'Connor.	FOIA Office.	⁸	8	152 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	J. Scott Tarbutton, Cozen	Department of Defense,				
481	Letter	3/16/2007	3/16/2007 Defense regarding FOIA request.	O'Connor.	FOIA Office.	§	%	172 KB	Attorney Work Product
			Letter correspondence with U.S. Department of	Will Kammner,	J. Scott Tarbutton,				
482	Letter	4/23/2007	4/23/2007 Defense regarding FOIA request.	Department of Defense.	Cozen O'Connor.	8	No No	49 KB	Attorney Work Product
					Gregory Smith, Financial				
					Crimes Enforcement				
		,			Network, Disclosure			_	
483	Letter	5/17/2007	5/17/2007 Motley Rice FOIA request to FinCEN	Michael Elsner	Office	9 N	No	88 KB	Attorney Work Product
					Gregory Smith, Financial				
					Crimes Enforcement			_	
70,	1	141	Motley Rice FOIA request to Dept of Treasury,		Network, Disclosure				
484	retter	5/1//Z00/ FINCEN	TINCEN T	Michael Elsner	Office	S S	S N	91 KB	Attorney Work Product
782	i offer	41220007	Dept of Treasury Financial Crimes Enforcement	dimo 6 months	Donold Madley		,		* *** *** *** *** *** *** *** *** ***
2	FOILE	012212001	Indiana leabolise to motiey pice i Oly pequest	Gregory A. Smith	COLORIDA ILLA COLORIDA	0	ıes	aN 016,1	Attorney work Product
					FUIA Unit, Federal Bureau of Investigation		,		
				John Fawcett, Kreingler &	U.S. Department of				
486	Letter	8/24/2007	8/24/2007 Correspondence Re FOIA Request	Kreindler	Justice	2	Q.	1398 KB	Attornev Work Product
				John Fawcett, Kreindler &	U.S. Securities and				
487	Fax	8/28/2007	8/28/2007 FOIA Request	Kreindler	Exchange Commission	2	yes	1656 KB	Attorney Work Product
					Scott Koch, Information				
	٥			:	and Privacy Coordinator,				
488	Fax	8/31/2007	8/31/2007 FOIA Request	John Fawcett, Kreindler & Kreindler	Central Intelligence	. 5	907	2332 KB	2332 KB Atterney Mork Broduct
				25.07	(Action)	2	yes	2002 ND	Audiley Work Floadel
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······································				David M. Hardy, Records Management Division, Federal Bureau of						
489	Letter	8/31/2007	8/31/2007 Correspondence Re FOIA Request	Investigation, U.S. Department of Justice	John Fawcett, Kreindler & Kreindler	2	yes	1020 KB	1020 KB Attorney Work Product	
				Dale Underwood,						T
				Disclosure Services, U.S.						
•	:			Department of the	John Fawcett, Kreindler					
490	Letter	9/14/2007	9/14/2007 Correspondence Re FOIA Request 2007-09-17	Treasury	& Kreindler	20	00	517 KB	Attorney Work Product	
			-	Everene Johnson,						
W.4-1-				FOIA/Privacy Act Officer,						
				U.S. Securities and	John Fawcett, Kreindler					
491	Letter	9/17/2007	9/17/2007 Correspondence Re FOIA Request 07-08345	Exchange Commission	& Kreindler	2	9	876 KB	Attorney Work Product	
				Brookly McLaughlin.					The state of the s	T-
				Deputy Asst Secretary,						
				Office of Public Affairs,						
-				U.S. Department of the	Christine Negroni,					
492	Letter	9/17/2007	9/17/2007 Correspondence Re FOIA Request 2005-01-014	Treasury	Kreindler & Kreindler	2	2	398 KB	Attorney Work Product	
					U.S. Federal Aviation					Τ-
				John Fawcett, Kreindler &	Administration FOIA					
493	Email	9/18/2007	9/18/2007 Correspondence Re FOIA Request 2007-7730	Kreindler	Coordinator	2	2	13 KB	Attorney Work Product	
				Joann Noonan, FOIA					No. 1. The state of the state o	1
				Specialist, Federal						
****				Aviation Authority, U.S.						
				Department of	John Fawcett, Kreindler					
494	Letter	9/19/2007	9/19/2007 Correspondence Re FOIA Request 2007-7730	Transportation	& Kreindler	2	2	117 KB	Attorney Work Product	
					Margaret A. Bestrain,					1
			Letter correspondence with U.S. Defense Intelligence J. Scott Tarbutton, Cozen	J. Scott Tarbutton, Cozen	Defense Intelligence					_
495	Letter	9/21/2007	9/21/2007 Agency regarding FOIA request.	O'Connor.	Agency.	2	No	100 KB	Attorney Work Product	
			Letter correspondence with U.S. Department of	Janice Galli McLeod,	J. Scott Tarbutton,					
496	Letter	9/25/2007	9/25/2007 Justice regarding FOIA request.	Department of Justice.	Cozen O'Connor.	2	<u>%</u>	31 KB	Attorney Work Product	
				Gloria L. Marshall,					4	
				Information Disclosure					,	
				Unit, Immigration and						_
				Customs Enforcement,			•			
				Department of Homeland	Christine Negroni,					
497	Letter	9/26/2007		Security	Kreindler & Kreindler	2	2	443 KB	Attorney Work Product	
			nth U.S. Department of State		J. Scott Tarbutton,					
498	Fax	9/27/2007	9/27/2007 regarding FOIA request.	Department of State.	Cozen O'Connor.	No No	No	38 KB	Attorney Work Product	
			Email correspondence with U.S. Department of State	Wilma Manning, Patrick D. Scholl. Department of	J. Scott Tarbutton.					
499	Email *	9/27/2007			Cozen O'Connor.	Š.	8	22 KB	Attorney Work Product	
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				John Fawcett, Kreindler &	U.S. Department of the					
200	гах	9/27/2007		Kreindler	Treasury	no	yes	2192 KB	Attorney Work Product	
j	:		Department of	J. Scott Tarbutton, Cozen	Aaron Graves,					$\overline{}$
501	Email	9/28/2007		O'Connor.	Department of Defense.	Yes	No	5 KB	Attorney Work Product	
ç	L	10000	ith U.S. Department of State	J. Scott Tarbutton, Cozen	Wilma Manning,				1777	
202	Email	9/28/2007		O'Connor.	Department of State.	Yes	No	24 KB	Attorney Work Product	
	:		Department of	Aaron Graves, Department J. Scott Tarbutton,	J. Scott Tarbutton,				AND THE RESIDENCE OF THE PARTY	1
503	Email	9/28/2007	9/28/2007 Defense regarding FOIA request.	of Defense.	Cozen O'Connor.	Yes	No	8 KB	Attorney Work Product	
				Scott Koch, Information						_
				and Privacy Coordinator,						
				Central Intelligence	John Fawcett, Kreindler					
504	Letter	10/1/2007		Agency	& Kreindler	2	2	999 KB	Attorney Work Product	
	:		. Department of	 Scott Tarbutton, Cozen 	Janice Galli McLeod,					_
505	Letter	10/2/2007	10/2/2007 Justice regarding FOIA request.	O'Connor.	Department of Justice.	2	No	76 KB	Attorney Work Product	
				Michael A Cirillo Sucteme						$\overline{}$
				Michael A. Cillio, Oystellis					•	
				Operations Services,						
				Federal Aviation Authority,	:					
-	:			U.S. Department of	John Fawcett, Kreindler					
909	Email	10/4/2007		Transportation	& Kreindler	20	yes	811 KB	Attorney Work Product	_
	:		Department of	 Scott Tarbutton, Cozen 	Aaron Graves,				Constitution in	
202	Email	10/8/2007		O'Connor.	Department of Defense.	No No	No	3 KB	Attorney Work Product	
			Department of	ırbutton, Cozen	Aaron Graves,					_
208	Email	10/9/2007		O'Connor.	Department of Defense.	Yes	8	9 KB	Attorney Work Product	
			Department of	es, Department						_
209	Email	10/9/2007		of Defense.	Cozen O'Connor.	Yes	2	10 KB	Attorney Work Product	
			with U.S. Department of State	Wilma Manning,	 Scott Tarbutton, 					-
210	Email	10/25/2007		Department of State.	Cozen O'Connor.	Yes	No No	7 KB	Attorney Work Product	
			ith U.S. Department of State	 Scott Tarbutton, Cozen 	Wilma Manning,					*
511	Email	10/26/2007		O'Connor.	Department of State.	Yes	<u>8</u>	7 KB	Attorney Work Product	
			eral Bureau of	Loren Shaver, Federal	 Scott Tarbutton, 					-
512	Letter	10/29/2007		Bureau of Investigation.	Cozen O'Connor.	^o N	Š	139 KB	Attorney Work Product	-
			re Services response to						The second secon	-
513	Letter	10/29/2007		Amanda Michanczyk	Michael Elsner	²	Yes	80 KB	Attorney Work Product	_
			FinCEN Disclosure Offices response to Motley Rice							-
514	Letter	11/5/2007		William F. Baity	Michael Elsner	2	S _e	34 KB	Attorney Work Product	
			reasury response to Motley Rice FOIA						T TOTAL COLOR	_
515	Letter	11/6/2007 Request		Amanda Michanczyk	Michael Elsner	No	No	95 KB	Attorney Work Product	
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